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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**NINETEENTH MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD APRIL 1, 2021 THROUGH APRIL 30, 2021**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 (Docket #553)
Period for which compensation and reimbursement is sought:	April 1, 2021 through April 30, 2021
Amount of compensation sought as actual, reasonable, and necessary:	\$760,686.80 (80% of \$950,858.50)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$5,570.42 (100%)
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this nineteenth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing April 1, 2021 through April 30, 2021 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$950,858.50 in fees during

the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$760,686.80.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$1,125.36. The blended hourly rate of paraprofessionals during the Application Period is \$250.81.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$5,570.42 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$5,570.42.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$760,686.80 (80% of \$950,858.50) and reimbursement of reasonable and necessary expenses incurred in the amount of \$5,570.42 (100%), for a total amount of \$766,257.22, for the Application Period.

Dated: June 30, 2021
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

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*Counsel for the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants.*

Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A001	Asset Analysis & Recovery	18.6	\$16,460.50
A004	Case Administration	7.2	\$8,719.50
A006	Employment / Fee Applications	4.7	\$1,568.00
A009	Meetings / Communications with AHC & Creditors	64.9	\$85,462.50
A019	Plan of Reorganization / Disclosure Statement	196.8	\$156,751.50
A020	Insurance Adversary Proceeding	856.0	\$681,896.50
		1,148.2	\$950,858.50

Exhibit B

Summary of Compensation by Professional

SUMMARY OF COMPENSATION BY PROFESSIONAL

Name of Professional	Position / Year Admitted to Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims - 2019	\$1,700.00	61.0	\$103,700.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,100.00	29.9	\$32,890.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York - 1997	\$1,400.00	149.9	\$209,860.00
Craig J. Litherland	Partner / State of Texas – 1983 Supreme Court of Texas – 1983 U.S. Court of Appeals Fifth Circuit – 1984 U.S. District Court for the Southern District of Texas – 1985 U.S. Federal Court for the Eastern District of Michigan – 1995 District of Columbia - 2001 U.S. District Court for the Western District of Texas – 2008 Cherokee Nation – 2017	\$1,400.00	8.9	\$12,460.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,350.00	88.7	\$119,745.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$800.00	111.4	\$89,120.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia - 2019	\$725.00	105.7	\$76,632.50
Emily Grim	Partner / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012 U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020	\$700.00	50.7	\$35,490.00

Name of Professional	Position / Year Admitted to Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Dan Wolf	Partner / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012	\$700.00	30.6	\$21,420.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia 2017	\$675.00	107.4	\$72,495.00
Adam Farra	Associate / State of Maryland – 2011 District of Columbia – 2015 U.S. Court of Appeals for the Second Circuit – 2017	\$625.00	3.6	\$2,250.00
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$575.00	92.5	\$53,187.50
Alison Gaske	Associate / District of Columbia – 2016	\$500.00	104.0	\$52,000.00
Ethan Kaminsky	Associate / State of New York – 2018	\$500.00	47.1	\$23,550.00
Christian Carey	Associate / District of Columbia – 2020	\$425.00	12.2	\$5,185.00
Janet Sanchez	Associate / Commonwealth of Virginia – 2020	\$375.00	7.4	\$2,775.00
Marnie Glaebberman	Staff Attorney / State of New York – 2007 District of Columbia – 2009	\$300.00	40.9	\$12,270.00
Tarsha Jones	Staff Attorney / State of Maryland – 2001 District of Columbia – 2006	\$300.00	30.8	\$9,240.00
Stephanie Colcock	Paralegal – Joined firm in 2020	\$330.00	9.4	\$3,102.00
Sherley Martinez	Paralegal – Joined firm in 2017	\$315.00	3.9	\$1,228.50
Katherine Johnson	Paralegal – Joined firm in 2018	\$230.00	34.3	\$7,889.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$230.00	13.7	\$3,151.00
Peggy Holland	Litigation Specialist – Joined firm in 2002	\$290.00	4.2	\$1,218.00
	Totals		1,148.2	\$950,858.50
	Attorney Blended Rate	\$1,125.36		
	Paraprofessional Blended Rate	\$253.26		

Exhibit C

Summary of Expenses Incurred

SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
Conference Calls / Court Solutions	\$350.00
Deposition / Court Transcripts	\$118.80
Filing Fees	\$200.00
Lexis	\$250.91
Pacer	\$245.50
Westlaw	\$4,405.21
Total	\$5,570.42

Exhibit D

Time and Expense Detail



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Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

June 30, 2021
Invoice Number: 11323292
Client Number: 1599
Tax ID: 52-2283869

FOR PROFESSIONAL SERVICES RENDERED through April 30, 2021

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	950,858.50	5,570.42	956,428.92
Total	950,858.50	5,570.42	956,428.92

TOTAL FEES \$ 950,858.50

TOTAL EXPENSES \$ 5,570.42

TOTAL FEES AND EXPENSES \$ 956,428.92

FOR PROFESSIONAL SERVICES RENDERED through April 30, 2021

Purdue Bankruptcy

A001: Asset Analysis & Recovery

Name	Date	Services	Hours	Amount
Ogrey, S.	4/01/21	Research new / closed cases for Debtors and Sacklers to update master tracking sheet of cases.	.40	92.00
Shore, R.	4/05/21	Confer with R. Leveridge, J. Rubinstein, J. Hudson, D. Wolf, E. Grim, A. Gaske, and S. Sraders re strategy for insurance recovery strategy.	.50	675.00
Grim, E.	4/05/21	Confer with insurance team re insurance recovery strategy.	.50	350.00
Rubinstein, J.	4/05/21	Confer with team re insurance recovery strategy.	.50	400.00
Wolf, D.	4/05/21	Confer with R. Shore, R. Leveridge, J. Hudson, and E. Grim re insurance recovery strategy.	.50	350.00
Gaske, A.	4/05/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, D. Wolf, J. Hudson, E. Grim, S. Sraders, and J. Sanchez re strategy and next steps.	.50	250.00
Sraders, S.	4/05/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, D. Wolf, E. Grim, A. Gaske, and J. Sanchez re strategy for insurance recovery and next steps.	.50	287.50
Hudson, J.	4/07/21	Analyze next steps for insurance recovery.	.20	145.00
Hudson, J.	4/11/21	Revise template settlement update letter.	1.20	870.00
Gilbert, S.	4/12/21	Confer with team re insurance status and strategy.	.50	850.00
Shore, R.	4/12/21	Confer with team re status, strategy, and next steps.	.50	675.00
Shore, R.	4/12/21	Revise draft letter to insurers re settlement.	.70	945.00
Hudson, J.	4/12/21	Draft update re insurance recovery efforts.	.40	290.00
Wolf, D.	4/12/21	Confer with S. Gilbert, R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, S. Sraders, and J. Sanchez re insurance recovery strategy.	.50	350.00
Sanchez, J.	4/12/21	Confer with team re status of insurance-related issues.	.50	187.50
Rush, M.	4/12/21	Confer with team re case status and strategy.	.50	337.50
Leveridge, R.	4/12/21	Confer with team re status of projects.	.50	700.00
Sraders, S.	4/12/21	Confer with S. Gilbert, R. Shore, R. Leveridge, J. Hudson, J. Rubinstein, D. Wolf, M. Rush, and J. Sanchez re status and strategy for insurance recovery.	.50	287.50

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Name	Date	Services	Hours	Amount
Hudson, J.	4/13/21	Revise template settlement outreach letter to insurers.	.20	145.00
Gilbert, S.	4/16/21	Confer with co-counsel re insurance strategy.	.50	850.00
Gilbert, S.	4/19/21	Confer with team re insurance strategy.	.30	510.00
Quinn, K.	4/19/21	Confer with bankruptcy and insurance teams re status and strategy related to insurance recovery.	.30	330.00
Shore, R.	4/19/21	Confer with bankruptcy and insurance teams re status of insurance recovery.	.30	405.00
Hudson, J.	4/19/21	Analyze status of insurance recovery efforts.	.10	72.50
Hudson, J.	4/19/21	Confer with bankruptcy and insurance teams re status of insurance recovery efforts.	.30	217.50
Grim, E.	4/19/21	Confer with bankruptcy and insurance teams re insurance recovery status and strategy.	.30	210.00
Rubinstein, J.	4/19/21	Confer with bankruptcy and insurance teams re status of insurance recovery.	.30	240.00
Wolf, D.	4/19/21	Confer with S. Gilbert, R. Shore, R. Leveridge, K. Quinn, J. Hudson, E. Grim, J. Rubinstein, J. Sanchez, and A. Gaske re insurance recovery strategy.	.20	140.00
Sanchez, J.	4/19/21	Confer with team re status of insurance-related issues.	.30	112.50
Gaske, A.	4/19/21	Confer with bankruptcy and insurance teams re insurance recovery strategy.	.30	150.00
Leveridge, R.	4/19/21	Confer with team re insurance recovery strategy and next steps.	.30	420.00
Martinez, S.	4/20/21	Review database re new financial, insurance, and litigation materials.	.30	94.50
Hudson, J.	4/22/21	Analyze next steps for insurance recovery.	.40	290.00
Gilbert, S.	4/26/21	Confer with insurance team re status.	.40	680.00
Quinn, K.	4/26/21	Confer with bankruptcy team re insurance recovery strategy.	.40	440.00
Shore, R.	4/26/21	Confer with J. Hudson, A. Gaske, J. Rubinstein, S. Gilbert, K. Quinn, R. Leveridge, E. Grim, D. Wolf, M. Rush, and S. Sraders re strategy for next steps.	.40	540.00
Hudson, J.	4/26/21	Analyze options for pursuing return of collateral from Insurer #12.	.10	72.50
Hudson, J.	4/26/21	Confer with team re insurance recovery strategy.	.40	290.00
Grim, E.	4/26/21	Confer with team re insurance recovery strategy and status.	.40	280.00
Rubinstein, J.	4/26/21	Confer with team re insurance recovery strategy.	.40	320.00

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Name	Date	Services	Hours	Amount
Wolf, D.	4/26/21	Confer with S. Gilbert, R. Shore, R. Leveridge, K. Quinn, J. Rubinstein, J. Hudson, E. Grim, M. Rush, S. Sraders, and A. Gaske re insurance strategy.	.40	280.00
Rush, M.	4/26/21	Confer with team re insurance recovery status and strategy.	.40	270.00
Gaske, A.	4/26/21	Confer with team re insurance recovery strategy.	.40	200.00
Leveridge, R.	4/26/21	Confer with team re insurance recovery strategy and related matters.	.40	560.00
Sraders, S.	4/26/21	Confer with J. Hudson, A. Gaske, J. Rubinstein, S. Gilbert, K. Quinn, R. Leveridge, E. Grim, D. Wolf, M. Rush, and R. Shore re strategy for next steps.	.40	230.00
Johnson, K.	4/28/21	Revise correspondence tracking spreadsheet re Insurers #16, #17 and #36.	.30	69.00
Project Total:			18.60	\$ 16,460.50

A004: Case Administration

Name	Date	Services	Hours	Amount
Gilbert, S.	4/01/21	Confer with Davis Polk re final order issues.	.50	850.00
Gilbert, S.	4/01/21	Confer with S. Birnbaum re final order issues.	.50	850.00
Johnson, K.	4/07/21	Draft pro hac vice application and notice of appearance for J. Rubinstein.	1.40	322.00
Gilbert, S.	4/13/21	Confer with S. Birnbaum re private creditor deals.	1.00	1,700.00
Sraders, S.	4/14/21	Review transcripts for quotes re abatement for P. Singer.	1.30	747.50
Gilbert, S.	4/21/21	Attend hearing re MSGE term sheet and other issues.	1.00	1,700.00
Gilbert, S.	4/23/21	Confer with M. Huebner and K. Eckstein re private creditor deals.	1.00	1,700.00
Gilbert, S.	4/27/21	Confer with S. Birnbaum re private creditor deals.	.50	850.00
Project Total:			7.20	\$ 8,719.50

A006: Employment / Fee Applications

Name	Date	Services	Hours	Amount
Holland, P.	4/12/21	Draft analysis of spreadsheet of time received from Fee Examiner re interim application.	1.30	377.00
Holland, P.	4/13/21	Draft and finalize response to Fee Examiner re 4th interim fee application.	1.40	406.00
Grim, E.	4/13/21	Revise response to Fee Examiner letter.	.50	350.00

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Name	Date	Services	Hours	Amount
Holland, P.	4/14/21	Draft February fee statement.	.80	232.00
Holland, P.	4/22/21	Finalize February fee statement.	.50	145.00
Holland, P.	4/22/21	Communicate with Fee Examiner and UST re February fee statement.	.20	58.00
Project Total:			4.70	\$ 1,568.00

A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	4/01/21	Attend AHC working group meeting.	2.00	3,400.00
Gilbert, S.	4/02/21	Confer with AHC mediation subgroup re co-defendant claims.	.50	850.00
Gilbert, S.	4/02/21	Confer with DOJ re plan proposed treatment of DOJ claim.	.30	510.00
Gilbert, S.	4/02/21	Confer with AHC mediation subgroup re final order issues.	.50	850.00
Gilbert, S.	4/05/21	Confer with AHC subgroup re tribal issues.	.50	850.00
Grim, E.	4/06/21	Confer with non-states re fee issues and Sackler negotiations,	1.00	700.00
Gilbert, S.	4/07/21	Confer with AHC mediation subgroup re hospital counsel fees.	1.00	1,700.00
Gilbert, S.	4/07/21	Attend AHC meeting re status and strategy.	1.60	2,720.00
Quinn, K.	4/07/21	Participate in call with client group re status and strategy.	1.60	1,760.00
Grim, E.	4/07/21	Confer with AHC re Sackler and plan negotiations.	1.60	1,120.00
Wolf, D.	4/07/21	Confer with client representatives and AHC co-counsel re plan documents and Sackler-related documents.	1.60	1,120.00
Leveridge, R.	4/07/21	Confer with AHC re plan issues.	1.60	2,240.00
Sraders, S.	4/07/21	Confer with Ad Hoc Committee re Sackler agreement and outstanding issues re plan of reorganization.	1.60	920.00
Gilbert, S.	4/08/21	Confer with AHC working group re plan negotiations.	1.50	2,550.00
Quinn, K.	4/08/21	Confer with Committee re plan negotiations.	.80	880.00
Grim, E.	4/08/21	Confer with non-states re attorney fee issues.	1.20	840.00
Grim, E.	4/08/21	Confer with AHC re plan issues.	1.10	770.00
Wolf, D.	4/08/21	Confer with client representatives and AHC counsel re plan documents.	1.10	770.00

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Name	Date	Services	Hours	Amount
Sraders, S.	4/08/21	Confer with AHC and E. Grim re allocation of costs for non-state governments.	1.20	690.00
Gilbert, S.	4/13/21	Confer with A. Troop re NCSG negotiations.	.50	850.00
Gilbert, S.	4/13/21	Confer with AHC working group re plan negotiations.	.50	850.00
Gilbert, S.	4/13/21	Confer with AHC mediation subgroup re abatement terms in plan meeting.	1.00	1,700.00
Quinn, K.	4/13/21	Participate in call with AHC mediation subgroup re abatement term sheet.	1.00	1,100.00
Grim, E.	4/13/21	Confer with AHC re Debtors' edits to abatement term sheet.	1.00	700.00
Gilbert, S.	4/14/21	Attend AHC working group meeting re abatement term sheet issues.	1.00	1,700.00
Gilbert, S.	4/14/21	Confer with tribes re trial deal issues.	.50	850.00
Hudson, J.	4/14/21	Attend Ad Hoc Committee meeting re insurance issues.	1.20	870.00
Grim, E.	4/14/21	Confer with AHC re updates on Sackler and plan negotiations.	1.30	910.00
Grim, E.	4/14/21	Confer with AHC mediation subgroup re Debtors' edits to abatement term sheet.	1.00	700.00
Sraders, S.	4/14/21	Confer with AHC re status of agreements with Sacklers, NCSG, and next steps in bankruptcy proceedings.	1.30	747.50
Gilbert, S.	4/15/21	Attend AHC working group meeting re plan negotiations.	1.00	1,700.00
Gilbert, S.	4/20/21	Confer with AHC re mediation and plan strategy.	1.00	1,700.00
Gilbert, S.	4/21/21	Meet with AHC working group re plan issues.	3.50	5,950.00
Gilbert, S.	4/22/21	Meet with AHC working group re private creditor deals and plan negotiations.	8.00	13,600.00
Gilbert, S.	4/22/21	Confer with J. Rice re plan issues.	1.00	1,700.00
Sraders, S.	4/22/21	Confer with non-state AHC members re proposed fee arrangement.	.50	287.50
Gilbert, S.	4/23/21	Confer with AHC re plan issues.	1.00	1,700.00
Gilbert, S.	4/23/21	Confer with NCSG re plan issues (1.2); confer with AHC re same (0.8).	2.00	3,400.00
Gilbert, S.	4/26/21	Confer with K. Maclay re MSGE term sheet.	.50	850.00
Gilbert, S.	4/26/21	Confer with TPPs re payment terms.	1.00	1,700.00
Gilbert, S.	4/26/21	Confer with tribes re deal terms.	1.00	1,700.00
Gilbert, S.	4/27/21	Confer with AHC re strategy.	1.00	1,700.00
Gilbert, S.	4/27/21	Confer with DOJ re plan treatment of DOJ claim.	1.00	1,700.00
Gilbert, S.	4/28/21	Confer with AHC re plan issues.	2.00	3,400.00

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Name	Date	Services	Hours	Amount
Gilbert, S.	4/29/21	Confer with AHC re Debtors' plan revisions.	1.00	1,700.00
Gilbert, S.	4/29/21	Attend AHC meeting re plan negotiations.	1.30	2,210.00
Quinn, K.	4/29/21	Participate in call with client re status and strategy.	1.30	1,430.00
Hudson, J.	4/29/21	Attend AHC call re insurance issues and plan strategy.	1.30	942.50
Grim, E.	4/29/21	Confer with AHC re plan negotiations and other issues.	1.30	910.00
Sraders, S.	4/29/21	Confer with AHC re status of ongoing proceedings and next steps.	1.30	747.50
Hudson, J.	4/30/21	Communicate with AHC re oppositions to be filed in adversary proceeding.	.30	217.50
Project Total:			64.90	\$ 85,462.50

A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Gilbert, S.	4/01/21	Confer with DOJ re claims.	.50	850.00
Quinn, K.	4/01/21	Review revised language re channeling injunction.	.30	330.00
Shore, R.	4/01/21	Analyze D&O issue.	.50	675.00
Hudson, J.	4/01/21	Review documents in which NewCo cooperation obligations re insurance will be reflected.	.20	145.00
Hudson, J.	4/01/21	Confer with Debtors' counsel (S. Massman) re approach to cooperation agreement.	.40	290.00
Hudson, J.	4/01/21	Begin drafting cooperation agreement.	.20	145.00
Hudson, J.	4/01/21	Analyze options for addressing D&O coverage in plan and related materials.	3.50	2,537.50
Hudson, J.	4/01/21	Revise insurance-related language in plan per discussion with Debtors' counsel (S. Massman).	1.10	797.50
Hudson, J.	4/01/21	Revise disclosure statement to comport with insurance-related revisions to plan.	1.40	1,015.00
Grim, E.	4/01/21	Review updated plan for new insurance-related issues raised by Debtors.	1.90	1,330.00
Grim, E.	4/01/21	Draft analysis re new insurance-related plan issues raised by Debtors.	1.20	840.00
Grim, E.	4/01/21	Research issues re plan treatment of co-defendant claims.	.60	420.00
Grim, E.	4/01/21	Confer with S. Massman (Debtors' counsel) re insurance-related plan issues.	.30	210.00
Wolf, D.	4/01/21	Revise plan documents re D&O insurance coverage rights.	1.50	1,050.00

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Wolf, D.	4/01/21	Confer with counsel for Debtors, Sacklers, UCC, and AHC re plan documents.	1.00	700.00
Wolf, D.	4/01/21	Review plan documents re D&O insurance coverage rights.	.60	420.00
Farra, A.	4/01/21	Analyze NewCo third-party claim issues.	.50	312.50
Farra, A.	4/01/21	Draft analysis re NewCo third party claim issues.	2.50	1,562.50
Sraders, S.	4/01/21	Analyze NewCo third-party claim issues.	.50	287.50
Gilbert, S.	4/02/21	Confer with insurance team re D&O issues.	1.00	1,700.00
Quinn, K.	4/02/21	Review governance term sheet and Debtors' revisions.	.20	220.00
Quinn, K.	4/02/21	Confer with insurance team re D&O insurance strategy.	1.00	1,100.00
Quinn, K.	4/02/21	Review edits to plan injunction language.	.40	440.00
Shore, R.	4/02/21	Confer with team re D&O coverage issues.	1.00	1,350.00
Hudson, J.	4/02/21	Confer with Debtors' counsel (S. Massman and S. Birnbaum) re options for addressing directors' and officers' coverage in plan and related materials.	1.00	725.00
Hudson, J.	4/02/21	Analyze options for addressing D&O coverage in plan and related materials.	2.10	1,522.50
Grim, E.	4/02/21	Confer with insurance team re treatment of D&O rights.	1.00	700.00
Grim, E.	4/02/21	Draft cooperation agreement.	.20	140.00
Wolf, D.	4/02/21	Revise plan documents re D&O insurance coverage rights.	.50	350.00
Wolf, D.	4/02/21	Confer with S. Gilbert, R. Shore, K. Quinn, J. Hudson, and E. Grim re D&O strategy re plan.	1.00	700.00
Wolf, D.	4/02/21	Confer with M. Huebner, S. Birnbaum, S. Massman, R. Shore, K. Quinn and J. Hudson re D&O insurance coverage.	.60	420.00
Sraders, S.	4/02/21	Review and revise draft summary of NewCo third-party issues.	.70	402.50
Quinn, K.	4/03/21	Communicate with E. Grim re revisions to injunction language in plan.	.30	330.00
Hudson, J.	4/03/21	Confer with Debtors (S. Massman and D. Kratzer) re insurance-related revisions to plan and related materials.	.60	435.00
Hudson, J.	4/03/21	Revise insurance-related revisions to plan and related materials.	.20	145.00
Grim, E.	4/03/21	Review plan to address additional insurance-related comments from Debtors.	.70	490.00
Grim, E.	4/03/21	Confer with Debtors' counsel (S. Massman, others) re insurance-related aspects of plan.	.70	490.00

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Grim, E.	4/03/21	Revise plan to address additional insurance-related comments from Debtors.	1.30	910.00
Quinn, K.	4/04/21	Review update re D&O negotiations.	.20	220.00
Hudson, J.	4/04/21	Revise insurance-related revisions of plan.	2.80	2,030.00
Wolf, D.	4/04/21	Revise plan documents re D&O insurance coverage rights.	.80	560.00
Shore, R.	4/05/21	Analyze D&O coverage issues.	.30	405.00
Hudson, J.	4/05/21	Analyze treatment of D&O policies in plan and related documents.	1.50	1,087.50
Hudson, J.	4/05/21	Confer with Debtors' counsel (Davis Polk) re terms of settling insurer injunction.	.10	72.50
Grim, E.	4/05/21	Revise additional plan provisions re insurance.	.60	420.00
Wolf, D.	4/05/21	Revise plan documents re D&O insurance coverage rights.	1.30	910.00
Quinn, K.	4/06/21	Consider MDT costs issues re cash flow presentation.	.30	330.00
Quinn, K.	4/06/21	Review disclosure statement and D&O issues.	.40	440.00
Hudson, J.	4/06/21	Revise treatment of D&O policies in plan and related documents.	.50	362.50
Grim, E.	4/06/21	Review Debtors' financial allocation.	.30	210.00
Grim, E.	4/06/21	Continue reviewing insurance-related provisions in plan.	.90	630.00
Gilbert, S.	4/07/21	Confer with S. Birnbaum re open plan issues.	.70	1,190.00
Gilbert, S.	4/07/21	Confer with AHC working group re open plan issues.	1.00	1,700.00
Gilbert, S.	4/07/21	Confer with S. Birnbaum re plan issues.	.50	850.00
Quinn, K.	4/07/21	Review revised insurer injunction for plan.	.60	660.00
Litherland, C.	4/07/21	Analyze issues re requests for limited coverage preservation for officers and employees.	.40	560.00
Hudson, J.	4/07/21	Revise insurance-related aspects of plan.	2.70	1,957.50
Hudson, J.	4/07/21	Confer with Debtors' counsel re insurance aspects of plan and related documents.	2.40	1,740.00
Grim, E.	4/07/21	Revise new version of plan reflecting Debtors' edits.	1.20	840.00
Wolf, D.	4/07/21	Revise plan documents re insurance coverage rights.	2.30	1,610.00
Sraders, S.	4/07/21	Review edits to plan re terms of payments to PI claimants.	1.40	805.00
Quinn, K.	4/08/21	Analyze insurance provisions in plan documents.	2.00	2,200.00
Litherland, C.	4/08/21	Analyze issues related to settlement limits on coverage for officers and employees.	.70	980.00

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Hudson, J.	4/08/21	Analyze areas for additional revisions of plan re insurance.	.50	362.50
Grim, E.	4/08/21	Confer with AHC co-counsel (G. Cicero) and S. Sraders re non-state attorney fee issues.	.30	210.00
Grim, E.	4/08/21	Confer with AHC co-counsel (G. Cicero, L. Benson (Brown Rudnick)), and S. Sraders re follow-up issues from fee call.	.40	280.00
Wolf, D.	4/08/21	Revise plan documents re insurance coverage rights.	2.50	1,750.00
Sraders, S.	4/08/21	Confer with AHC co-counsel (G. Cicero) and E. Grim re upcoming discussion re fees and costs allocation for non-state entities.	.30	172.50
Sraders, S.	4/08/21	Review research re fees and common benefit funds.	.20	115.00
Gilbert, S.	4/09/21	Confer with DOJ re proposed treatment of DOJ claim.	.50	850.00
Hudson, J.	4/09/21	Confer with Debtors (M. Huebner and S. Massman) re insurance-related revisions to plan.	.40	290.00
Hudson, J.	4/09/21	Confer with co-counsel at Kramer Levin (R. Ringer) re insurance-related aspects of plan.	.20	145.00
Wolf, D.	4/09/21	Revise plan documents re insurance coverage rights.	1.20	840.00
Hudson, J.	4/11/21	Review UCC mark-up of plan for insurance-related impacts.	.20	145.00
Hudson, J.	4/11/21	Revise insurance-related provisions in plan to reflect discussion with Debtors.	.80	580.00
Quinn, K.	4/12/21	Participate in call with co-counsel (Kramer Levin and others) re Jersey assets.	1.00	1,100.00
Shore, R.	4/12/21	Analyze plan documents re insurance recovery.	.40	540.00
Hudson, J.	4/12/21	Analyze next steps for insurance recovery, including relevant provisions of plan documents.	.40	290.00
Hudson, J.	4/12/21	Confer with Kramer Levin (R. Ringer) re UCC edits to plan.	.20	145.00
Hudson, J.	4/12/21	Analyze insurance-related revisions to plan to comport with term sheet.	.10	72.50
Grim, E.	4/12/21	Review UCC revisions to plan and updated Sackler agreement.	.50	350.00
Rubinstein, J.	4/12/21	Analyze insurance recovery provisions in current plan documents.	.40	320.00
Sraders, S.	4/12/21	Analyze new term proposed for plan to determine consistency with term sheet.	.30	172.50
Hudson, J.	4/13/21	Review released party list for D&O insurance implications.	.10	72.50

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Grim, E.	4/13/21	Revise non-state attorneys' fee protocol.	1.90	1,330.00
Wolf, D.	4/13/21	Confer with counsel for Debtors (A. Libby, A. Romero-Wagner), AHC (K. Eckstein), and Sacklers re releases in plan documents.	1.10	770.00
Sraders, S.	4/13/21	Analyze fee orders from other cases to determine appropriate format and structure.	.50	287.50
Gilbert, S.	4/14/21	Confer with NCSG re plan.	1.00	1,700.00
Shore, R.	4/14/21	Communicate with E. Grim and J. Hudson re neutrality language.	.20	270.00
Hudson, J.	4/14/21	Review and comment on insurers' proposed neutrality language.	.60	435.00
Hudson, J.	4/14/21	Analyze insurance-related considerations for plan documents.	.10	72.50
Grim, E.	4/14/21	Revise proposed insurer plan neutrality language.	.70	490.00
Wolf, D.	4/14/21	Confer with counsel for Debtors (A. Libby, A. Romero-Wagner), AHC (K. Eckstein), UCC (A. Preis), and Sacklers re releases in plan documents.	.50	350.00
Wolf, D.	4/14/21	Confer with counsel for Debtors (A. Libby, A. Romero-Wagner), AHC (K. Eckstein), and UCC (A. Preis) re releases in plan documents.	.70	490.00
Wolf, D.	4/14/21	Confer with AHC, K. Eckstein, and R. Ringer re drafting of plan documents.	1.30	910.00
Quinn, K.	4/15/21	Confer with Debtors' counsel (A. Libby) and co-counsel (K. Eckstein) re security issues in settlement (partial).	.80	880.00
Hudson, J.	4/15/21	Review insurance neutrality language in preparation for call with Debtors.	.20	145.00
Grim, E.	4/15/21	Revise protocol for attorney fee funds.	3.10	2,170.00
Grim, E.	4/15/21	Continue to revise new insurance-related plan language.	.20	140.00
Gilbert, S.	4/16/21	Confer with NCSG re plan issues.	1.00	1,700.00
Quinn, K.	4/16/21	Confer with insurer counsel re neutrality request.	.50	550.00
Quinn, K.	4/16/21	Correspond with team re follow up to Davis Polk call.	.30	330.00
Quinn, K.	4/16/21	Participate in call with Debtors' counsel, Reed Smith, S. Gilbert, and J. Hudson re plan language.	1.00	1,100.00
Shore, R.	4/16/21	Review correspondence re valuation issue.	.30	405.00
Hudson, J.	4/16/21	Confer with Debtors re insurance edits to plan.	.70	507.50
Hudson, J.	4/16/21	Prepare for call with Debtors re insurance edits to plan.	.40	290.00
Hudson, J.	4/16/21	Prepare for call with Debtors re insurance neutrality language.	.40	290.00

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Hudson, J.	4/16/21	Revise plan provisions re insurance distribution to mirror term sheet.	.30	217.50
Hudson, J.	4/16/21	Revise plan language re projected value of claims.	.50	362.50
Hudson, J.	4/16/21	Confer with Debtors (S. Massman) re revising plan provisions pertaining to insurance distribution to mirror term sheet.	.40	290.00
Grim, E.	4/16/21	Confer with Debtors' counsel (E. Vonnegut, others) re insurance-related plan provisions.	.70	490.00
Grim, E.	4/16/21	Confer with insurance team re insurance-related plan provisions.	.30	210.00
Wolf, D.	4/16/21	Confer with counsel for Debtors (P. Singer, A. Kramer, E. Vonnegut, S. Massman), S. Gilbert, K. Quinn, and J. Hudson re plan documents and insurance coverage issues.	.70	490.00
Quinn, K.	4/17/21	Review update re objections filed.	.10	110.00
Gilbert, S.	4/18/21	Confer with G. Coutts re plan issues.	.50	850.00
Quinn, K.	4/18/21	Correspond with Debtors re open issues in plan draft.	.20	220.00
Hudson, J.	4/18/21	Revise plan language re projected value of claims.	.40	290.00
Gilbert, S.	4/19/21	Confer with AHC subgroup re plan issues.	.50	850.00
Gilbert, S.	4/19/21	Confer with Davis Polk re plan issues.	1.00	1,700.00
Quinn, K.	4/19/21	Correspond with M. Huebner re revisions to plan language.	.30	330.00
Shore, R.	4/19/21	Review correspondence re plan revisions.	.50	675.00
Hudson, J.	4/19/21	Revise valuation language for plan.	.90	652.50
Hudson, J.	4/19/21	Analyze Debtors' non-exhaustive list of MDT policies to be attached to plan as compared to adversary complaint and other policy evidence.	.10	72.50
Hudson, J.	4/19/21	Analyze MDT costs/operating reserves request to address insurance-related budget.	.70	507.50
Hudson, J.	4/19/21	Analyze outstanding insurance-related items for plan and related documents.	.40	290.00
Hudson, J.	4/19/21	Confer with Debtors' counsel (Davis Polk and Reed Smith) and shareholder counsel (Milbank) re valuation language for plan.	1.00	725.00
Grim, E.	4/19/21	Confer with financial advisors re funding issues for MDT.	.50	350.00
Grim, E.	4/19/21	Confer with S. Sradars re research on issue relating to attorneys' fees.	.30	210.00
Wolf, D.	4/19/21	Confer with counsel for Debtors, AHC, and UCC re releases in plan documents.	.50	350.00

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Wolf, D.	4/19/21	Confer with counsel for Debtors, AHC, UCC, and Sacklers re releases in plan documents.	.50	350.00
Wolf, D.	4/19/21	Revise plan documents re insurance coverage issues.	1.80	1,260.00
Sraders, S.	4/19/21	Confer with E. Grim re memorandum on attorney fee issues.	.40	230.00
Sraders, S.	4/19/21	Research re bankruptcy court authority to modify contingency fee agreements.	4.20	2,415.00
Grim, E.	4/20/21	Research issue relating to attorney fee fund.	.80	560.00
Grim, E.	4/20/21	Confer with non-states re attorney fee issues.	1.00	700.00
Sraders, S.	4/20/21	Confer with non-state members of AHC, G. Cicero (Brown Rudnick), L. Benson (Brown Rudnick), and E. Grim re attorney fee agreements.	1.00	575.00
Sraders, S.	4/20/21	Research re attorney fee fund issues.	6.00	3,450.00
Sraders, S.	4/20/21	Confer with G. Cicero (Brown Rudnick) and E. Grim re analysis of bankruptcy court authority to modify creditor fee agreements.	.80	460.00
Quinn, K.	4/21/21	Correspond with team re MDT function and impact on core analysis.	.40	440.00
Quinn, K.	4/21/21	Confer with E. Grim re fee structure options.	.40	440.00
Hudson, J.	4/21/21	Analyze outstanding insurance-related items for plan and related documents.	.50	362.50
Grim, E.	4/21/21	Research issue relating to attorneys' fee fund.	1.60	1,120.00
Grim, E.	4/21/21	Revise memorandum re issue relating to attorneys' fee fund.	1.70	1,190.00
Grim, E.	4/21/21	Revise allocation proposal for attorneys' fee fund.	.90	630.00
Grim, E.	4/21/21	Communicate with G. Cicero (Brown Rudnick) re allocation proposal for attorneys' fee fund.	.10	70.00
Sraders, S.	4/21/21	Revise draft summary of research re attorney fee issues.	3.80	2,185.00
Quinn, K.	4/22/21	Review memorandum re fees issue.	.20	220.00
Quinn, K.	4/22/21	Communicate with insurance team re liquidation analysis.	.50	550.00
Shore, R.	4/22/21	Analyze valuation issues.	.30	405.00
Hudson, J.	4/22/21	Revise insurance-related items in liquidation analysis and valuation statement.	1.40	1,015.00
Hudson, J.	4/22/21	Add necessary insurance-related placeholders to amended plan draft.	.20	145.00
Grim, E.	4/22/21	Revise memorandum re plan implementation issue.	.20	140.00
Wolf, D.	4/22/21	Revise disclosure statement documents re insurance coverage issues.	1.60	1,120.00

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Quinn, K.	4/23/21	Review insurers' objection to disclosure statement.	.50	550.00
Hudson, J.	4/23/21	Review insurer objections to disclosure statement.	.10	72.50
Hudson, J.	4/23/21	Confirm inclusion of necessary insurance-related placeholders to amended plan draft.	.10	72.50
Grim, E.	4/23/21	Review revised PI TDP.	.50	350.00
Grim, E.	4/23/21	Review insurer objections to disclosure statement.	.50	350.00
Johnson, K.	4/23/21	Review court docket for insurer objections to disclosure statement.	.50	115.00
Hudson, J.	4/24/21	Review Debtors' insurance-related revisions to plan.	.10	72.50
Wolf, D.	4/24/21	Revise plan documents re insurance coverage issues.	1.30	910.00
Gilbert, S.	4/25/21	Confer with Davis Polk re plan objections.	1.50	2,550.00
Quinn, K.	4/25/21	Communicate with team re existing models for neutrality briefing.	.30	330.00
Quinn, K.	4/25/21	Review summaries of disclosure objections.	1.50	1,650.00
Hudson, J.	4/25/21	Begin to outline opposition to insurers' objection to disclosure statement.	.10	72.50
Gilbert, S.	4/26/21	Confer with Kramer Levin re issues list.	.80	1,360.00
Hudson, J.	4/26/21	Communicate with claimant constituencies re update on opposition to insurers' objection to disclosure statement.	.10	72.50
Hudson, J.	4/26/21	Continue to outline opposition to insurers' objection to disclosure statement.	1.20	870.00
Grim, E.	4/26/21	Draft outline for reply to insurer disclosure statement.	1.40	980.00
Johnson, K.	4/26/21	Review court docket for new insurer objections to disclosure statement.	.20	46.00
Kaminsky, E.	4/26/21	Review materials in preparation for drafting opposition to disclosure objection.	1.40	700.00
Kaminsky, E.	4/26/21	Research opposition to objection to disclosure.	3.00	1,500.00
Kaminsky, E.	4/26/21	Draft opposition to objection to disclosure.	2.00	1,000.00
Kaminsky, E.	4/26/21	Draft opposition to motion objecting to disclosure statement.	2.00	1,000.00
Gilbert, S.	4/27/21	Confer with A. Troop re plan.	.50	850.00
Gilbert, S.	4/27/21	Confer with E. Grim and S. Sradars re co-defendant claims.	.50	850.00
Quinn, K.	4/27/21	Participate in call with Jersey counsel re settlement terms.	1.00	1,100.00
Quinn, K.	4/27/21	Review draft issues list.	.40	440.00

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Hudson, J.	4/27/21	Draft list of insurance-related positions on plan issues and redline plan to address insurance-related needs.	3.50	2,537.50
Hudson, J.	4/27/21	Begin drafting fact section of opposition to insurers' objection to disclosure statement.	.40	290.00
Grim, E.	4/27/21	Revise newest iteration of plan.	.60	420.00
Grim, E.	4/27/21	Research issues relating to executory contracts.	.30	210.00
Grim, E.	4/27/21	Confer with S. Gilbert and S. Sraders re issues relating to executory contracts.	.50	350.00
Wolf, D.	4/27/21	Revise plan documents re insurance coverage issues.	.50	350.00
Sraders, S.	4/27/21	Confer with S. Gilbert and E. Grim re Debtors' agreements with distributors.	.50	287.50
Sraders, S.	4/27/21	Analyze third-party agreements for plan purposes.	2.90	1,667.50
Kaminsky, E.	4/27/21	Research re opposition to motion objecting to disclosure statement.	1.50	750.00
Kaminsky, E.	4/27/21	Draft re opposition to motion objecting to disclosure statement.	1.00	500.00
Gilbert, S.	4/28/21	Confer with AHC subgroup re co-defendant claims.	.50	850.00
Gilbert, S.	4/28/21	Confer with S. Birnbaum re plan issues.	.50	850.00
Gilbert, S.	4/28/21	Confer with MSGE re plan.	1.00	1,700.00
Shore, R.	4/28/21	Confer with counsel for Debtors (S. Birnbaum, A. Kramer, P. Breene), UCC (A. Preis, M. Hurley), D. Wolf, and J. Hudson re revisions to plan documents re insurance coverage.	.40	540.00
Hudson, J.	4/28/21	Revise opposition to insurers' objection to disclosure statement.	6.80	4,930.00
Hudson, J.	4/28/21	Confer with Debtors (Davis Polk) re objections to disclosure statement.	.20	145.00
Grim, E.	4/28/21	Draft reply to insurer objection to disclosure statement.	.20	140.00
Grim, E.	4/28/21	Analyze co-defendant agreements.	.20	140.00
Wolf, D.	4/28/21	Confer with counsel for Debtors (S. Birnbaum, A. Kramer, P. Breene), UCC (A. Preis, M. Hurley), R. Shore, and J. Hudson re revisions to plan documents re insurance coverage.	.40	280.00
Kaminsky, E.	4/28/21	Revise opposition to motion to object to disclosure statement.	3.00	1,500.00
Quinn, K.	4/29/21	Further revisions to language potentially resolving disclosure statement objection.	.30	330.00
Quinn, K.	4/29/21	Revise draft response to insurer objection.	.70	770.00

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Quinn, K.	4/29/21	Confer with Debtors re opposition to insurers' disclosure statement objection.	.30	330.00
Litherland, C.	4/29/21	Revise portions of response to insurer objection to disclosure statement related to insurance neutrality.	.80	1,120.00
Litherland, C.	4/29/21	Communications with R. Shore and J. Hudson re insurance neutrality issues raised by disclosure objection.	.90	1,260.00
Hudson, J.	4/29/21	Prepare for call with Debtors (Davis Polk) re objections to disclosure statement.	.10	72.50
Hudson, J.	4/29/21	Participate in call with Debtors (Davis Polk and Reed Smith) re objections to disclosure statement.	.30	217.50
Hudson, J.	4/29/21	Follow up on call with Debtors (Davis Polk and Reed Smith) re objections to disclosure statement.	.10	72.50
Hudson, J.	4/29/21	Revise objections to disclosure statement for insurance implications.	.20	145.00
Hudson, J.	4/29/21	Revise joinder in opposition to insurers' objection to disclosure statement with respect to insurance neutrality.	3.10	2,247.50
Grim, E.	4/29/21	Revise reply to insurer objection to disclosure statement.	2.40	1,680.00
Grim, E.	4/29/21	Review cases re insurer objection to disclosure statement.	.40	280.00
Grim, E.	4/29/21	Confer with Debtors' counsel (S. Massman, others) re reply to insurer objection to disclosure statement.	.30	210.00
Grim, E.	4/29/21	Research issues relating to co-defendant plan provisions.	1.40	980.00
Grim, E.	4/29/21	Confer with S. Sraders and M. Rush re co-defendant plan provisions.	.50	350.00
Wolf, D.	4/29/21	Revise plan documents re insurance coverage issues.	.20	140.00
Johnson, K.	4/29/21	Review court docket re insurer objections to disclosure statement.	.10	23.00
Sraders, S.	4/29/21	Confer with E. Grim re third-party plan issues.	.50	287.50
Sraders, S.	4/29/21	Confer with E. Grim and M. Rush re third-party plan issues.	.50	287.50
Sraders, S.	4/29/21	Analyze proposed insurance neutrality language.	.30	172.50
Sraders, S.	4/29/21	Analyze Debtors' third-party contracts.	1.90	1,092.50
Quinn, K.	4/30/21	Revise neutrality insert for disclosure statement.	.30	330.00
Hudson, J.	4/30/21	Revise neutrality wording for amended disclosure statement.	.10	72.50
Grim, E.	4/30/21	Revise reply to insurer objection to disclosure statement.	1.10	770.00

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Name	Date	Services	Hours	Amount
Grim, E.	4/30/21	Analyze issues re co-defendant treatment in plan.	1.80	1,260.00
Grim, E.	4/30/21	Confer with PEC representatives re co-defendant treatment in plan.	.40	280.00
Grim, E.	4/30/21	Confer with non-state members re attorneys' fee resolution.	.90	630.00
Sraders, S.	4/30/21	Confer with J. Conroy (PEC) and E. Grim re co-defendant issues.	.40	230.00
Sraders, S.	4/30/21	Analyze third-party plan issues.	1.50	862.50
Project Total:			196.80	\$ 156,751.50

A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Hudson, J.	4/01/21	Finalize approach to substituting Insurer #31.	.10	72.50
Rubinstein, J.	4/01/21	Review R. Shore comments to April 6 hearing talking points (0.3); revise draft jurisdictional discovery (1.2); review options for substituting Insurer #31 (0.4); confer with K. Johnson re researching JAMS/AAA client lists related to personal jurisdiction issues (0.2); review information re same (0.5); confer with litigation team re strategy and next steps in advance of motion to dismiss briefing (1.0)	3.60	2,880.00
Johnson, K.	4/01/21	Confer with J. Rubinstein re foreign insurers and arbitration / mediation research (0.2); research past JAMS and AAA arbitration clients (0.9).	1.10	253.00
Gaske, A.	4/01/21	Revise insurer-specific fact chart re preparation for motions hearing.	3.50	1,750.00
Gaske, A.	4/01/21	Confer with R. Leveridge, J. Rubinstein and S. Sraders re preparation for motions practice.	1.00	500.00
Gaske, A.	4/01/21	Revise draft discovery requests pursuant to R. Leveridge and J. Rubinstein comments.	.30	150.00
Gaske, A.	4/01/21	Draft list of questions for A. Kramer re factual support in preparation for motions practice.	1.40	700.00
Gaske, A.	4/01/21	Review policy type and whether policy includes arbitration provision re preparation for motions practice.	.50	250.00
Gaske, A.	4/01/21	Review information re exhaustive factual chart in preparation for motions practice.	.60	300.00
Leveridge, R.	4/01/21	Review issues to be addressed at pre-trial conference (0.9); confer with Debtors' counsel re pre-trial conference (0.7); communications with UCC counsel re same (0.3).	1.90	2,660.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	4/01/21	Confer with counsel for Insurer #31 re substitution issue (0.4); communications with Debtors' counsel re same (0.3); communication with counsel for Insurer #31 re same (0.2); review communications between Debtors' counsel and insurer counsel re same (0.5).	1.40	1,960.00
Leveridge, R.	4/01/21	Review and revise draft discovery requests.	1.30	1,820.00
Leveridge, R.	4/01/21	Confer with litigation team re status of legal and factual research on anticipated motions and additional projects.	1.00	1,400.00
Sraders, S.	4/01/21	Analyze insurers' US contacts.	1.00	575.00
Sraders, S.	4/01/21	Review comments and revisions to requests for document productions.	.20	115.00
Shore, R.	4/02/21	Confer with R. Leveridge, J. Hudson, D. Wolf, S. Sraders and A. Gaske re insurance recovery strategy.	.60	810.00
Hudson, J.	4/02/21	Confer with team re insurance adversary proceeding status and strategy.	.60	435.00
Hudson, J.	4/02/21	Review prior correspondence in response to question from Insurer #36.	.10	72.50
Hudson, J.	4/02/21	Draft template settlement update letter.	.60	435.00
Rubinstein, J.	4/02/21	Analysis re drafting supplemental discovery to Marsh re meeting attendance by foreign insurers and their representatives as relates to personal jurisdiction issue and review prior discovery to Marsh re same (1.2); analysis re internal schedule for personal jurisdiction brief (0.2); analysis re personal jurisdiction factual analysis development (0.8); provide comments to Debtors' search term results and process re personal jurisdiction issue (0.7).	2.90	2,320.00
Rubinstein, J.	4/02/21	Confer with team re status of adversary proceeding and insurance recovery strategy.	.60	480.00
Wolf, D.	4/02/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, S. Sraders, and A. Gaske re upcoming adversary proceeding hearings and insurance recovery strategy.	.60	420.00
Johnson, K.	4/02/21	Draft spreadsheet re compilation of personal jurisdiction evidence from various sources.	2.20	506.00
Gaske, A.	4/02/21	Review insurer communications tracking re evidence of prior correspondence with Insurer #36.	.50	250.00
Gaske, A.	4/02/21	Confer with team re insurance adversary status and strategy.	.60	300.00

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Name	Date	Services	Hours	Amount
Gaske, A.	4/02/21	Draft list of factual events for A. Kramer re additional related evidence in preparation for motions practice.	.90	450.00
Gaske, A.	4/02/21	Confer with K. Johnson re creation of exhaustive factual spreadsheet in preparation for motions practice.	.30	150.00
Leveridge, R.	4/02/21	Confer with UCC counsel (Usatine, Hanson) re pretrial conference and related issues.	1.20	1,680.00
Leveridge, R.	4/02/21	Review material in preparation for opposition to motions to dismiss on jurisdictional grounds (2.8); communicate with Debtors' counsel and UCC counsel re discovery issues relating thereto (0.6).	3.40	4,760.00
Leveridge, R.	4/02/21	Review status of adversary proceedings projects (1.3); draft internal schedule for briefing re personal jurisdiction issues (0.3).	1.60	2,240.00
Leveridge, R.	4/02/21	Communications with Debtors' counsel re agenda for April 6 hearing.	.20	280.00
Leveridge, R.	4/02/21	Confer with team re status of adversary proceeding projects.	.60	840.00
Leveridge, R.	4/02/21	Communications with counsel for Debtors, UCC and insurer counsel re extension of response date in light of plan to substitute Insurer #31.	.40	560.00
Sraders, S.	4/02/21	Confer with R. Leveridge, J. Hudson, J. Rubinstein, D. Wolf, A. Gaske, and R. Shore re status and strategy for insurance adversary proceeding.	.60	345.00
Shore, R.	4/05/21	Analyze pre-trial conference issues (0.8); confer with Debtors (M. Huebner) re same (0.2).	1.00	1,350.00
Hudson, J.	4/05/21	Review history of communications with Insurers #5 and #36 to prepare for motions practice.	.40	290.00
Hudson, J.	4/05/21	Review materials and issues in preparation for pre-trial conference.	.90	652.50
Hudson, J.	4/05/21	Begin reviewing responses to complaint for drafting response to same.	.50	362.50
Gaske, A.	4/05/21	Revise exhaustive factual spreadsheet to include insurer information and coverage territory.	3.00	1,500.00
Gaske, A.	4/05/21	Additional revisions to exhaustive factual spreadsheet per comments and additional information from A. Kramer.	3.40	1,700.00
Leveridge, R.	4/05/21	Review materials in preparation for adversary proceeding pre-trial conference (1.0); communicate with Debtors' counsel re same (0.4); review legal research relevant to pre-hearing conference (1.2).	2.60	3,640.00
Sraders, S.	4/05/21	Revise personal jurisdiction research outline.	1.20	690.00

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Name	Date	Services	Hours	Amount
Sraders, S.	4/05/21	Review recent filings by insurers in adversary proceeding.	.30	172.50
Gilbert, S.	4/06/21	Attend insurance adversary pre-trial conference.	2.50	4,250.00
Quinn, K.	4/06/21	Participate in pre-trial conference / hearing.	2.50	2,750.00
Shore, R.	4/06/21	Attend pre-trial conference.	2.50	3,375.00
Shore, R.	4/06/21	Analyze personal jurisdiction opposition and general discovery strategy (0.6); review proposed MDT budget (0.3); confer with R. Leveridge, J. Rubinstein, and J. Hudson re follow up to first pre-trial conference (0.6).	1.50	2,025.00
Hudson, J.	4/06/21	Attend pre-trial conference.	2.50	1,812.50
Hudson, J.	4/06/21	Continue to review and prepare to respond to responses to complaint.	.70	507.50
Hudson, J.	4/06/21	Confer with R. Leveridge, J. Rubinstein and R. Shore re post pre-trial conference.	.60	435.00
Hudson, J.	4/06/21	Prepare budget for insurance pursuit, focused on post-confirmation period.	.60	435.00
Hudson, J.	4/06/21	Summarize outcome of pre-trial conference.	.70	507.50
Rubinstein, J.	4/06/21	Confer with co-plaintiff counsel prior to hearing re strategy (0.3); begin review of insurers' initial motions (1.2); participate in pre-trial conference re case management (2.5); confer with R. Leveridge, R. Shore, and J. Hudson re hearing next steps re discovery (0.6); analyze budget through trial (1.2); analyze strategy re responses to insurer motions to dismiss (0.6); communications with co-plaintiff counsel re meet-and-confer sessions with insurer defendants (0.3).	6.70	5,360.00
Rush, M.	4/06/21	Review insurers' motions to dismiss.	2.30	1,552.50
Rush, M.	4/06/21	Communicate with team re insurers' motions and strategy to respond.	.80	540.00
Johnson, K.	4/06/21	Review and organize recent filings in adversary proceeding (2.9); revise tracking spreadsheet re same (0.7).	3.60	828.00
Gaske, A.	4/06/21	Communicate with R. Leveridge, R. Shore, J. Rubinstein, J. Hudson, M. Rush, and S. Sraders re April 5 filings and status conference.	.50	250.00
Gaske, A.	4/06/21	Revise exhaustive factual chart re opposition to motion to dismiss for personal jurisdiction.	2.60	1,300.00
Gaske, A.	4/06/21	Review Chubb's motion to dismiss for lack of personal jurisdiction.	.60	300.00
Gaske, A.	4/06/21	Draft tracking chart re pleadings filed on April 5.	2.90	1,450.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	4/06/21	Review materials in preparation for pre-trial conference.	.50	700.00
Leveridge, R.	4/06/21	Participate in pre-trial conference (2.5); confer with team re same (0.6).	3.10	4,340.00
Leveridge, R.	4/06/21	Review briefs filed in support of motions to dismiss for lack of personal jurisdiction.	1.80	2,520.00
Leveridge, R.	4/06/21	Review draft jurisdictional discovery requests (0.6); communicate with counsel for Debtors and UCC re same (0.2); draft communication to insurers re discovery meet-and-confers (1.1).	1.90	2,660.00
Leveridge, R.	4/06/21	Communicate with team re litigation budget.	.90	1,260.00
Sraders, S.	4/06/21	Draft outline for consolidated response to insurers' motions to dismiss based on lack of personal jurisdiction.	1.60	920.00
Sraders, S.	4/06/21	Analyze motions to dismiss on grounds of personal jurisdiction filed by insurers.	1.80	1,035.00
Shore, R.	4/07/21	Analyze MDT budget estimate.	1.20	1,620.00
Shore, R.	4/07/21	Analyze insurance litigation strategy.	1.00	1,350.00
Rubinstein, J.	4/07/21	Revise personal jurisdiction discovery requests (1.2); begin reviewing collection of insurer motions re withdraw of reference, for stay in favor of arbitration, for more definite statement, and for dismissal based on lack of personal jurisdiction for responses, including affirmations as related to jurisdictional discovery (2.5); correspond with co-plaintiff counsel re search of Debtors' documents re personal jurisdiction issues (0.3); analyze correspondence with insurer counsel re meet-and-confers re discovery (0.2); review projected litigation budget (0.4).	4.60	3,680.00
Gaske, A.	4/07/21	Review parties that filed a motion to dismiss for lack of personal jurisdiction.	.60	300.00
Leveridge, R.	4/07/21	Prepare for meet-and-confer with insurer counsel re discovery (1.3); review draft jurisdictional discovery (0.4); review communications from insurers re meet-and-confers (0.3); communicate with Debtors' counsel re same (0.2).	2.20	3,080.00
Leveridge, R.	4/07/21	Review insurers' filings in support of motion to dismiss for lack of personal jurisdiction (1.9); communicate with co-plaintiffs' counsel re same and material from Debtors to support opposition (0.4).	2.30	3,220.00
Sraders, S.	4/07/21	Draft portion of response to insurers' motion to dismiss for lack of personal jurisdiction.	3.50	2,012.50

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Name	Date	Services	Hours	Amount
Shore, R.	4/08/21	Communicate with S. Gilbert re MDT fee / expense estimate for coverage litigation (0.3); communicate with team re personal jurisdiction discovery requests and meet-and-confers with insurers (0.5).	.80	1,080.00
Hudson, J.	4/08/21	Revise estimates of cost for litigation post-confirmation.	.20	145.00
Hudson, J.	4/08/21	Analyze next steps for insurance recovery.	.40	290.00
Rubinstein, J.	4/08/21	Communicate with R. Leveridge re scheduling meet-and-confer with insurers and edits to personal jurisdiction discovery requests (0.3); revise personal jurisdiction discovery requests to incorporate R. Leveridge and other plaintiff counsel comments (1.5); complete review of insurer personal jurisdiction affirmations re personal jurisdiction discovery and draft supplemental requests (2.4); continue review of motion to dismiss briefing in preparation for drafting opposition papers (1.9); confer with co-plaintiff counsel re strategy for review of Debtors' documents re personal jurisdiction factual support (0.5); provide comments to proposed responses to insurer counsel re meet-and-confer discussions (0.3).	6.90	5,520.00
Rush, M.	4/08/21	Review strategy re opposition to insurers' motions to dismiss and jurisdictional discovery.	1.10	742.50
Johnson, K.	4/08/21	Finalize pro hac vice application and notice of appearance for J. Rubinstein in adversary proceeding.	1.60	368.00
Johnson, K.	4/08/21	Draft insurer counsel contact list re filings of motions to dismiss and joint motion to stay.	2.30	529.00
Johnson, K.	4/08/21	Review RIMS 2019 list of companies re foreign insurers.	.20	46.00
Gaske, A.	4/08/21	Confer with R. Hoff, A. Crawford, R. Leveridge and J. Rubinstein re discovery from Debtors' documents.	.50	250.00
Gaske, A.	4/08/21	Revise pleading tracking chart re additional pleadings.	.30	150.00
Gaske, A.	4/08/21	Review opposition to motion to dismiss for personal jurisdiction.	1.00	500.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	4/08/21	Review comments from R. Shore re jurisdictional discovery requests (0.8); draft jurisdictional discovery requests (3.8); review input from counsel for Debtors and UCC re same (0.3); communications with counsel for personal jurisdiction insurers re discovery (0.6); analyze issues in preparation for meet-and-confer (0.5); review comments re opposition to motion to dismiss on personal jurisdiction grounds (0.6).	6.60	9,240.00
Leveridge, R.	4/08/21	Confer with counsel for Debtors (R. Hoff) re document search by Debtors to support opposition to personal jurisdiction motion.	.50	700.00
Sraders, S.	4/08/21	Analyze next steps re personal jurisdiction motion and discovery.	.70	402.50
Sraders, S.	4/08/21	Draft response to motion to dismiss for personal jurisdiction.	4.90	2,817.50
Sraders, S.	4/08/21	Review definitions and instructions for requests for production.	.20	115.00
Shore, R.	4/09/21	Analyze pending items and next steps re adversary proceeding.	1.10	1,485.00
Shore, R.	4/09/21	Meet-and-confer with insurers re jurisdictional discovery.	1.10	1,485.00
Shore, R.	4/09/21	Confer with R. Leveridge and J. Rubinstein re meet-and-confer strategy re personal jurisdiction insurers.	.60	810.00
Hudson, J.	4/09/21	Analyze next steps for insurance recovery.	1.00	725.00
Rubinstein, J.	4/09/21	Analyze search terms to narrow scope of documents identified for review re personal jurisdiction issue and submit recommendations to co-plaintiff counsel (2.9); confer with R. Leveridge and R. Shore re meet-and-confer strategy re personal jurisdiction insurers (0.6); participate in meet-and-confer with insurers re personal jurisdiction discovery (1.1); confer with Debtors' counsel re meet-and-confer with insurers (0.4); personal jurisdiction factual research (0.7); begin reviewing answers filed by defendant insurers (0.9).	6.60	5,280.00
Rush, M.	4/09/21	Research in support of opposition to motion to dismiss (2.0); revise opposition to motions to dismiss (2.9).	4.90	3,307.50
Johnson, K.	4/09/21	Revise insurer counsel contact list re filings of motions to dismiss.	.30	69.00
Gaske, A.	4/09/21	Draft summary of best evidence in opposition to motion to dismiss for lack of personal jurisdiction.	.90	450.00
Gaske, A.	4/09/21	Meet-and-confer with insurer counsel re personal jurisdiction discovery.	1.10	550.00

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Name	Date	Services	Hours	Amount
Gaske, A.	4/09/21	Revise requests for production re personal jurisdiction to incorporate definitions and instructions.	3.20	1,600.00
Gaske, A.	4/09/21	Confer with A. Crawford, P. Breene, R. Leveridge, J. Rubinstein and R. Shore after personal jurisdiction meet-and-confer re next steps.	.30	150.00
Leveridge, R.	4/09/21	Review materials in preparation for meet-and-confer with personal jurisdiction insurers re jurisdictional discovery (3.1); communications with P. Koepff (insurer counsel) re same (0.5); communications with counsel for Debtors and UCC re same (1.2).	4.80	6,720.00
Leveridge, R.	4/09/21	Meet-and-confer with insurer counsel re personal jurisdiction discovery (1.1); follow up communications with counsel for Debtors and UCC (0.6).	1.70	2,380.00
Leveridge, R.	4/09/21	Communicate with team re search term activity by Debtors (0.6); review follow-up communication from J. Rubinstein to R. Hoff re same (0.2).	.80	1,120.00
Leveridge, R.	4/09/21	Review definitions and instructions for jurisdictional discovery requests.	.40	560.00
Sraders, S.	4/09/21	Revise draft response to motion to dismiss.	1.30	747.50
Rubinstein, J.	4/10/21	Analyze questions raised by M. Rush in drafting opposition to insurer motions to dismiss for lack of personal jurisdiction (0.3); continue review of insurer defendant answers and affirmative defenses (0.9).	1.20	960.00
Rush, M.	4/10/21	Draft response to insurers' motions to dismiss.	4.80	3,240.00
Leveridge, R.	4/10/21	Communications with M. Rush and J. Rubinstein re draft opposition brief.	.40	560.00
Hudson, J.	4/11/21	Begin drafting outline for response to motion for more definite statement.	.10	72.50
Rubinstein, J.	4/11/21	Review edits to jurisdictional discovery.	.40	320.00
Rush, M.	4/11/21	Revise opposition to motion to dismiss.	2.50	1,687.50
Gaske, A.	4/11/21	Revise requests for production re personal jurisdiction pursuant to R. Leveridge comments.	1.40	700.00
Gaske, A.	4/11/21	Review factual information to support opposition to motion to dismiss for personal jurisdiction.	.20	100.00
Leveridge, R.	4/11/21	Review and revise draft instructions and definitions (0.7); review communications with insurers re personal jurisdiction discovery (0.2).	.90	1,260.00
Shore, R.	4/12/21	Draft document requests re personal jurisdiction.	.80	1,080.00
Hudson, J.	4/12/21	Analyze next steps for motions practice.	.30	217.50

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Name	Date	Services	Hours	Amount
Hudson, J.	4/12/21	Review draft discovery communications.	.10	72.50
Rubinstein, J.	4/12/21	Correspond with A. Gaske re fact section of Debtors' document review memorandum (0.2); complete initial review of insurer answers filed in response to adversary complaint (0.7); analyze filed joinders to withdraw reference and corporate disclosure statements (1.3); analyze additional filings re withdraw of reference (1.3); revise personal jurisdiction requests for production to incorporate comments of R. Leveridge and R. Shore (2.7); revise draft letter to Judge Drain re jurisdictional discovery (0.4); analyze additional motion to withdraw reference (0.4); analyze motion to stay adversary proceeding pending motion to withdraw reference (0.9).	7.90	6,320.00
Rush, M.	4/12/21	Continue revising opposition to motion to dismiss.	3.20	2,160.00
Leveridge, R.	4/12/21	Review and provide comments re draft jurisdictional discovery requests (2.9); communicate with other plaintiffs' counsel re same (0.3).	3.20	4,480.00
Leveridge, R.	4/12/21	Draft letter to Court re status of jurisdictional discovery (1.5); communications with other plaintiffs' counsel re same (0.4).	1.90	2,660.00
Leveridge, R.	4/12/21	Communications with Debtors and UCC counsel re scheduling meet-and-confers with insurers (0.2); communications with insurer counsel re same (0.2).	.40	560.00
Leveridge, R.	4/12/21	Review material re opposition to motion to dismiss on personal jurisdiction grounds.	1.20	1,680.00
Farra, A.	4/12/21	Analyze litigation strategy and status.	.30	187.50
Shore, R.	4/13/21	Confer with Debtors' counsel, UCC, R. Leveridge and J. Rubinstein re personal jurisdiction discovery and obtaining hearing date re pending motions to dismiss.	.50	675.00
Shore, R.	4/13/21	Analyze insurance adversary proceeding strategy and discovery.	1.20	1,620.00
Shore, R.	4/13/21	Communicate with R. Leveridge and J. Rubinstein re P. Breene suggestion.	.20	270.00
Hudson, J.	4/13/21	Analyze next steps for insurance pursuit via adversary proceeding and settlement discussions.	.70	507.50
Hudson, J.	4/13/21	Begin outlining consolidated opposition to motions for more definite statement.	1.90	1,377.50
Hudson, J.	4/13/21	Review issues raised in motions responding to complaint.	.20	145.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	4/13/21	Review insurer filed corporate ownership disclosures (0.2); revise draft personal jurisdiction discovery (1.5); confer with Debtors' counsel and UCC re obtaining hearing date related to pending motions to dismiss (0.5); review communications re insurer group discovery meet-and-confer sessions (0.5).	2.70	2,160.00
Wolf, D.	4/13/21	Review insurance adversary proceeding strategy.	.50	350.00
Rush, M.	4/13/21	Review insurers' motions for more definite statement.	.70	472.50
Rush, M.	4/13/21	Research 12(e) issues in response to insurer motions.	1.20	810.00
Rush, M.	4/13/21	Analyze next steps re insurance recovery.	.70	472.50
Johnson, K.	4/13/21	Revise adversary motion tracking chart re recently filed pleadings.	.40	92.00
Gaske, A.	4/13/21	Review motions for a more definite statement.	1.10	550.00
Gaske, A.	4/13/21	Review opposition to motion to dismiss.	1.00	500.00
Gaske, A.	4/13/21	Draft portion of Debtors' document review guidance memorandum.	1.10	550.00
Gaske, A.	4/13/21	Revise draft opposition to motion to dismiss for lack of personal jurisdiction re supporting facts (2.0); investigate and respond to comments in draft of same (2.5).	4.50	2,250.00
Leveridge, R.	4/13/21	Confer with counsel for Debtors and UCC re personal jurisdictional discovery (0.5); revise discovery (3.0); communications with certain insurer counsel re revised jurisdictional discovery and scheduling additional meet-and-confer re same (0.4).	3.90	5,460.00
Leveridge, R.	4/13/21	Review materials in preparation of briefing on opposition to motion to dismiss re personal jurisdiction (1.6); communicate with counsel for Debtors re same (0.2).	1.80	2,520.00
Leveridge, R.	4/13/21	Communications with counsel for insurers re scheduling hearing on motions to dismiss and meet-and-confer sessions on scope of discovery with arbitration and non-moving insurers.	.90	1,260.00
Sraders, S.	4/13/21	Analyze next steps re personal jurisdiction response brief.	.30	172.50
Sraders, S.	4/13/21	Revise draft response to motion to dismiss to incorporate comments from M. Rush.	1.40	805.00
Shore, R.	4/14/21	Review motion to withdraw reference.	1.00	1,350.00
Shore, R.	4/14/21	Confer with insurer counsel re personal jurisdiction issues.	.70	945.00

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Name	Date	Services	Hours	Amount
Shore, R.	4/14/21	Review response to insurers related to personal jurisdiction discovery.	.20	270.00
Hudson, J.	4/14/21	Review issues for meet-and-confer session re personal jurisdiction discovery.	.10	72.50
Hudson, J.	4/14/21	Review insurer letter in response to proposed personal jurisdiction discovery.	.10	72.50
Rubinstein, J.	4/14/21	Review materials for meet-and-confer with insurer group re personal jurisdiction discovery (1.6); provide comments to draft discovery requests to arbitration insurers (0.3); review correspondence from various insurer groups re meet-and-confer sessions re scope of discovery (0.6); begin revising response brief to insurers' motions to dismiss for lack of personal jurisdiction (1.2).	3.70	2,960.00
Rush, M.	4/14/21	Revise opposition to motion to dismiss.	2.00	1,350.00
Rush, M.	4/14/21	Confer with A. Kramer and R. Leveridge re jurisdictional issues.	1.00	675.00
Rush, M.	4/14/21	Review discovery to insurers re arbitration issues.	.10	67.50
Gaske, A.	4/14/21	Draft memorandum re Debtors' document review guidance.	4.50	2,250.00
Leveridge, R.	4/14/21	Review materials in preparation for call with A. Kramer re personal jurisdiction issues.	1.50	2,100.00
Leveridge, R.	4/14/21	Confer with A. Kramer and M. Rush re personal jurisdiction factual issues.	1.00	1,400.00
Leveridge, R.	4/14/21	Prepare for meet-and-confer with insurer counsel re jurisdictional discovery (0.7); review letter from insurer counsel re same (0.8); communicate with team re same (0.6); participate in meet-and-confer with insurer counsel re personal jurisdiction discovery (1.4); follow-up communication with other plaintiffs' counsel (0.4).	3.90	5,460.00
Leveridge, R.	4/14/21	Review draft of opposition to personal jurisdiction motion to dismiss.	1.60	2,240.00
Shore, R.	4/15/21	Review correspondence with insurers re discovery (0.5); participate in meet-and-confer with arbitration insurers re discovery (0.8).	1.30	1,755.00
Shore, R.	4/15/21	Review and comment on discovery requests to arbitration insurers.	.30	405.00
Hudson, J.	4/15/21	Review status of oppositions to responses to adversary complaint.	.40	290.00
Hudson, J.	4/15/21	Revise outline of consolidated opposition to motions for more definite statement.	.30	217.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	4/15/21	Revise opposition to personal jurisdiction insurers' motions to dismiss (2.0); confer with R. Leveridge and M. Rush re same (0.7); participate in meet-and-confer with insurers (0.8); revise background section of personal jurisdiction document review memorandum (0.8).	4.30	3,440.00
Rush, M.	4/15/21	Revise opposition to personal jurisdiction motions to dismiss.	5.90	3,982.50
Rush, M.	4/15/21	Confer with A. Kramer re jurisdictional issues.	1.50	1,012.50
Rush, M.	4/15/21	Confer with J. Rubinstein and R. Leveridge re opposition to personal jurisdiction motions.	.70	472.50
Gaske, A.	4/15/21	Review and respond to questions from M. Rush re opposition to motion to dismiss for lack of personal jurisdiction.	1.60	800.00
Leveridge, R.	4/15/21	Review J. Rubinstein comments to draft of personal jurisdiction opposition (0.4); confer with M. Rush and J. Rubinstein re opposition (0.7).	1.10	1,540.00
Leveridge, R.	4/15/21	Review personal jurisdiction opposition (0.4); confer with A. Kramer re facts relevant to personal jurisdiction opposition (1.5).	1.90	2,660.00
Leveridge, R.	4/15/21	Review letter for personal jurisdiction insurer counsel re jurisdictional discovery (1.8); communicate with other plaintiffs counsel re same (0.5).	2.30	3,220.00
Leveridge, R.	4/15/21	Review communication from arbitration asserting insurer counsel (0.2); communicate with other plaintiffs' counsel re same (0.3); revise response to insurer counsel (1.4); meet-and-confer with arbitration counsel re same (0.8); communications with other plaintiffs' counsel and insurer counsel re process for requesting hearing date on outstanding motions (0.2).	2.90	4,060.00
Sraders, S.	4/15/21	Research re personal jurisdiction in response to questions raised by M. Rush.	2.50	1,437.50
Gilbert, S.	4/16/21	Confer with insurance team re strategy.	.60	1,020.00
Shore, R.	4/16/21	Analyze next steps for insurance litigation and recovery.	.60	810.00
Shore, R.	4/16/21	Confer with S. Gilbert, R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, A. Gaske, S. Sraders and E. Kaminsky re current status of ongoing proceedings and strategy for next steps.	.60	810.00
Shore, R.	4/16/21	Meet-and-confer with insurers re discovery.	.50	675.00
Shore, R.	4/16/21	Review and comment on memorandum of document review team re personal jurisdiction.	.20	270.00

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Shore, R.	4/16/21	Review and revise letter with insurers re scope of document search/production.	.60	810.00
Hudson, J.	4/16/21	Confer with Debtors' counsel (A. Kramer) re settlement discussions with Insurer #2.	.20	145.00
Hudson, J.	4/16/21	Confer with team re insurance recovery strategy.	.60	435.00
Hudson, J.	4/16/21	Confer with counsel for Insurer #2 re next steps for settlement.	.10	72.50
Hudson, J.	4/16/21	Comment on draft responses to discovery letter from insurers.	.50	362.50
Hudson, J.	4/16/21	Revise settlement update letter.	.10	72.50
Hudson, J.	4/16/21	Draft outline of next steps for discussions with Insurer #15.	.10	72.50
Hudson, J.	4/16/21	Draft outline of next steps for discussions with Insurer #12.	.10	72.50
Hudson, J.	4/16/21	Review research in support of consolidated opposition to motions for more definite statement.	.20	145.00
Hudson, J.	4/16/21	Review status of oppositions to responses to adversary complaint.	.40	290.00
Rubinstein, J.	4/16/21	Finalize drafting personal jurisdiction document review memorandum and send to co-plaintiff counsel for comment (0.9); participate in meet-and-confer with non-personal jurisdiction and non-arbitration insurer defendants (1.5); revise correspondence with insurer groups re meet-and-confer negotiations (1.3); revise memorandum in opposition to insurer motions to dismiss for lack of personal jurisdiction (2.2).	5.90	4,720.00
Rubinstein, J.	4/16/21	Confer with team insurance litigation strategy.	.60	480.00
Rush, M.	4/16/21	Revise opposition to motions to dismiss.	6.40	4,320.00
Rush, M.	4/16/21	Confer with team re litigation strategy.	.60	405.00
Gaske, A.	4/16/21	Revise insurer correspondence tracking sheet re additional correspondence.	1.00	500.00
Gaske, A.	4/16/21	Confer with team re insurance recovery strategy and status.	.60	300.00
Gaske, A.	4/16/21	Revise memorandum re document review guidance pursuant to J. Rubinstein's comments.	1.60	800.00
Leveridge, R.	4/16/21	Review issues in preparation for meet-and-confer with non-moving insurer counsel (0.3); review letter from non-moving insurer counsel (0.2); review comments to same from Debtors' counsel (0.4); add comments to same (0.4); participate in meet-and-confer with insurers (1.5); communications with Debtors' counsel re same (0.4).	3.20	4,480.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	4/16/21	Review case law relevant to personal jurisdiction opposition (0.6); review draft of opposition and comments from J. Rubinstein (0.8); provide comments to same (0.5).	1.90	2,660.00
Leveridge, R.	4/16/21	Confer with team re litigation strategy, status and upcoming deadlines.	.60	840.00
Leveridge, R.	4/16/21	Review letter from personal jurisdiction insurer counsel re jurisdictional discovery (0.5); draft response (1.2); communications with counsel for Debtors, UCC and personal jurisdiction insurers re response (0.1).	1.80	2,520.00
Sraders, S.	4/16/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, A. Gaske and E. Kaminsky re current status of ongoing proceedings and strategy for next steps.	.60	345.00
Sraders, S.	4/16/21	Research re personal jurisdiction.	1.00	575.00
Kaminsky, E.	4/16/21	Research re opposition to motion for more definite statement.	3.30	1,650.00
Rush, M.	4/17/21	Revise opposition to motions to dismiss.	1.50	1,012.50
Leveridge, R.	4/17/21	Review and revise updated draft of opposition.	1.20	1,680.00
Rubinstein, J.	4/18/21	Revise current version of opposition brief re personal jurisdiction.	1.10	880.00
Rush, M.	4/18/21	Revise opposition to motion to dismiss re personal jurisdiction.	1.90	1,282.50
Rush, M.	4/18/21	Research Rule 12(e) motions.	1.10	742.50
Leveridge, R.	4/18/21	Review notes re meet-and-confer with non-moving insurers re discovery.	.60	840.00
Leveridge, R.	4/18/21	Review strategy re personal jurisdiction opposition brief.	.50	700.00
Sraders, S.	4/18/21	Research re personal jurisdiction.	2.30	1,322.50
Kaminsky, E.	4/18/21	Research re opposition to motion for a more definite statement.	4.00	2,000.00
Kaminsky, E.	4/18/21	Draft research memorandum re opposition to motion for a more definite statement.	1.10	550.00
Shore, R.	4/19/21	Revise settlement letter to insurers.	.70	945.00
Shore, R.	4/19/21	Review and revise personal jurisdiction brief.	1.90	2,565.00
Hudson, J.	4/19/21	Analyze discovery issues.	.10	72.50
Hudson, J.	4/19/21	Analyze process for finalizing response to pending arbitration motion.	.20	145.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	4/19/21	Analysis re various discussions with insurer groups re status of meet-and-confer discussions (0.9); revise opposition to insurers' motions to dismiss for lack of personal jurisdiction (2.4); review National Union and St. Paul papers seeking more definite statement in order to provide comments on draft opposition (0.8); review insurers' motion to stay in favor of arbitration in order to provide comments on draft opposition (0.7)	4.80	3,840.00
Rush, M.	4/19/21	Revise opposition to motion to dismiss re personal jurisdiction.	3.30	2,227.50
Leveridge, R.	4/19/21	Communications with counsel for insurers re scope of jurisdictional discovery (0.5); communications with counsel for Debtors and UCC re same (0.4).	.90	1,260.00
Leveridge, R.	4/19/21	Review motions to dismiss for lack of personal jurisdiction (1.3); review sample answer and affirmative defenses (0.6).	1.90	2,660.00
Leveridge, R.	4/19/21	Review and revise drafts of personal jurisdiction opposition brief.	2.20	3,080.00
Leveridge, R.	4/19/21	Communications with counsel for Debtors re hearing date for argument on motions to dismiss.	.40	560.00
Kaminsky, E.	4/19/21	Legal research re opposition to motion for a more definite statement.	3.20	1,600.00
Shore, R.	4/20/21	Review and revise personal jurisdiction brief.	4.50	6,075.00
Hudson, J.	4/20/21	Draft consolidated opposition to motions for more definite statement.	11.60	8,410.00
Hudson, J.	4/20/21	Review draft opposition to motion to withdraw the reference from the bankruptcy court.	.10	72.50
Rubinstein, J.	4/20/21	Analysis re editing draft opposition to insurers' motions to dismiss for lack of personal jurisdiction and drafting supporting documents (1.2); review personal jurisdiction fact research in support of opposition motion (0.4); review draft opposition to motion to withdraw reference to provide comments/edits to Debtors' counsel (1.9).	3.50	2,800.00
Rush, M.	4/20/21	Review supporting documents for motion to dismiss opposition.	.60	405.00
Rush, M.	4/20/21	Communications with J. Hudson re 12(e) standards.	.40	270.00
Gaske, A.	4/20/21	Review opposition to motion to dismiss for personal jurisdiction.	.60	300.00
Leveridge, R.	4/20/21	Review and revise draft objection to motion to withdraw the reference.	2.70	3,780.00
Leveridge, R.	4/20/21	Review communication from personal jurisdiction insurers re confidentiality.	.20	280.00

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Leveridge, R.	4/20/21	Communicate with Debtors' counsel re document review relevant to personal jurisdiction motions (0.8); analyze materials in support of personal jurisdiction opposition (1.4).	2.20	3,080.00
Ogrey, S.	4/20/21	Review and compare policy lists on exhibit to adversary complaint and Debtors' draft insurance policy list.	3.20	736.00
Sraders, S.	4/20/21	Review next steps in preparing response to insurers' motion to dismiss.	.70	402.50
Kaminsky, E.	4/20/21	Continue research re opposition to motion for more definite statement.	3.30	1,650.00
Kaminsky, E.	4/20/21	Draft opposition to motion for more definite statement.	2.60	1,300.00
Shore, R.	4/21/21	Review and revise personal jurisdiction brief (3.3); review comments from team re brief (1.2).	4.50	6,075.00
Litherland, C.	4/21/21	Review draft brief re core jurisdiction issues.	1.10	1,540.00
Hudson, J.	4/21/21	Review stipulation re substituting parties.	.10	72.50
Hudson, J.	4/21/21	Revise consolidated opposition to motions re personal jurisdiction.	1.80	1,305.00
Hudson, J.	4/21/21	Revise consolidated opposition to motions for more definite statement.	.30	217.50
Hudson, J.	4/21/21	Review revised portions of opposition to motion to withdraw the reference.	.10	72.50
Rubinstein, J.	4/21/21	Provide comments re party substitution pleading (0.3); provide comments on draft personal jurisdiction insurer confidentiality agreement (0.6); provide analysis/comments re opposition to motion to withdraw the reference, oppositions to motions to dismiss for lack of personal jurisdiction, and opposition to motions for more definite statement (2.0); communications with team re factual research re personal jurisdiction opposition brief (0.6).	3.50	2,800.00
Rush, M.	4/21/21	Draft supporting materials to opposition to insurers' motion to dismiss re personal jurisdiction.	8.50	5,737.50
Rush, M.	4/21/21	Review document review memorandum.	.60	405.00
Rush, M.	4/21/21	Revise opposition to insurers' motion to dismiss re personal jurisdiction.	1.00	675.00
Rush, M.	4/21/21	Confer with document review vendor re jurisdictional review project.	.90	607.50
Gaske, A.	4/21/21	Confer with R. Hoff, D. Windscheffel, document review vendor (Cobra) and M. Rush re document review project.	.90	450.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	4/21/21	Review and revise proposed confidentiality agreement re jurisdictional discovery (0.5); communications with Debtors' counsel re same (0.3).	.80	1,120.00
Leveridge, R.	4/21/21	Review and revise opposition to motion for more definite statement.	.70	980.00
Leveridge, R.	4/21/21	Analyze arguments in objection to motion to withdraw the reference (0.8); communications with Debtors' counsel re same (0.3).	1.10	1,540.00
Leveridge, R.	4/21/21	Review proposed stipulation of substitution of Insurer #31.	.40	560.00
Quinn, K.	4/22/21	Review revised draft of objection to motion to withdraw the reference.	.30	330.00
Shore, R.	4/22/21	Review insurers' markup of configuration agreement.	.30	405.00
Shore, R.	4/22/21	Confer with R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, S. Sraders and A. Gaske re opposition to personal jurisdiction motions (1.8); review same (1.2).	3.00	4,050.00
Hudson, J.	4/22/21	Provide comments re opposition to motions to withdraw the reference.	.50	362.50
Hudson, J.	4/22/21	Confer with litigation team re revisions to consolidated opposition to motions for more definite statement.	1.80	1,305.00
Rubinstein, J.	4/22/21	Revise draft of A. Kramer declaration in support of opposition to motion to dismiss for lack of personal jurisdiction (1.0); participate in meet-and-confer with personal jurisdiction insurers re draft confidentiality agreement (0.7); review proposed edits to personal jurisdiction opposition brief (0.5); confer with drafting team re opposition to motion to dismiss for lack of personal jurisdiction and factual investigation relevant to same (1.8); analyze motions to seal as relates to opposition briefs (0.2)	4.20	3,360.00
Rush, M.	4/22/21	Revise opposition to personal jurisdiction motions to dismiss.	7.70	5,197.50
Rush, M.	4/22/21	Confer with R. Leveridge, J. Rubinstein, R. Shore, J. Hudson, A. Gaske, and S. Sraders re opposition to personal jurisdiction motions to dismiss.	1.80	1,215.00
Johnson, K.	4/22/21	Review letter agreement re jurisdictional discovery.	.10	23.00
Gaske, A.	4/22/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, and S. Sraders re draft opposition to motion to dismiss.	1.80	900.00
Gaske, A.	4/22/21	Analyze insurance recovery strategy.	.60	300.00

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Name	Date	Services	Hours	Amount
Gaske, A.	4/22/21	Research re agency for purposes of personal jurisdiction.	3.20	1,600.00
Gaske, A.	4/22/21	Draft declaration in support of opposition to motion to dismiss for lack of personal jurisdiction.	1.90	950.00
Leveridge, R.	4/22/21	Review comments re draft objection to motion to withdraw (0.3); revise same (1.1).	1.40	1,960.00
Leveridge, R.	4/22/21	Confer with litigation team re revisions to opposition to motion to dismiss on personal jurisdiction grounds (1.8); review supporting materials re same (1.8).	3.60	5,040.00
Leveridge, R.	4/22/21	Communicate with plaintiffs' counsel and counsel for personal jurisdiction insurers re confidentiality agreement (0.5); revise and finalize same (1.3)	1.80	2,520.00
Sraders, S.	4/22/21	Confer with R. Leveridge, R. Shore, J. Rubinstein, J. Hudson, M. Rush and A Gaske re revisions to current draft of opposition to motion to dismiss.	1.80	1,035.00
Sraders, S.	4/22/21	Research in support of personal jurisdiction opposition in response to questions raised by M. Rush and R. Shore.	5.70	3,277.50
Kaminsky, E.	4/22/21	Follow-up research for opposition to motion for more definite statement.	1.00	500.00
Shore, R.	4/23/21	Confer with D. Wolf, R. Leveridge, J. Hudson, M. Rush, S. Sraders, and A. Gaske re insurance adversary proceeding and insurance recovery strategy.	.40	540.00
Shore, R.	4/23/21	Review and revise motion to withdraw reference (2.6); review core/arbitration brief (1.8).	4.40	5,940.00
Hudson, J.	4/23/21	Confer with team re insurance recovery and next steps.	.40	290.00
Hudson, J.	4/23/21	Revise consolidated opposition to motions for more definite statement.	.90	652.50
Rubinstein, J.	4/23/21	Review proposed edits of R. Shore re opposition to insurers' motions for more definite statement (0.6); revise draft opposition to motions to stay adversary proceeding for arbitration (2.2); revise draft opposition to insurer motions to dismiss based on lack of personal jurisdiction (2.4).	5.20	4,160.00
Rubinstein, J.	4/23/21	Confer with team insurance recovery strategy.	.40	320.00
Wolf, D.	4/23/21	Confer with R. Shore, R. Leveridge, J. Hudson, M. Rush, S. Sraders, and A. Gaske re insurance adversary proceeding and insurance recovery strategy.	.40	280.00
Rush, M.	4/23/21	Revise opposition to personal jurisdiction motions to dismiss.	5.50	3,712.50

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Name	Date	Services	Hours	Amount
Rush, M.	4/23/21	Confer with team re litigation / insurance recovery strategy.	.40	270.00
Johnson, K.	4/23/21	Review recent confidentiality agreement and jurisdictional discovery.	.50	115.00
Johnson, K.	4/23/21	Revise pleadings tracker to reflect recent insurer filings.	1.40	322.00
Gaske, A.	4/23/21	Review revised chart re motions tracking.	.30	150.00
Gaske, A.	4/23/21	Draft declaration in support of opposition to motion to dismiss for lack of personal jurisdiction.	2.30	1,150.00
Gaske, A.	4/23/21	Review produced documents re insurer U.S. contacts.	1.10	550.00
Gaske, A.	4/23/21	Confer with team re next steps for insurance recovery.	.40	200.00
Leveridge, R.	4/23/21	Review revised draft of personal jurisdiction opposition brief (1.5); revise same (1.9); communications with Debtors and UCC counsel re same (0.4).	3.80	5,320.00
Leveridge, R.	4/23/21	Confer with team re status of litigation projects and other related matters.	.40	560.00
Leveridge, R.	4/23/21	Review and revise draft opposition to motion to stay in favor of arbitration (1.6); communication with Debtors' counsel re same (0.3).	1.90	2,660.00
Leveridge, R.	4/23/21	Communications with certain insurer counsel re personal jurisdictional discovery status.	.60	840.00
Sraders, S.	4/23/21	Research re personal jurisdiction under New York law.	1.60	920.00
Sraders, S.	4/23/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, D. Wolf, M. Rush, and A. Gaske re strategy for next steps.	.40	230.00
Kaminsky, E.	4/23/21	Research follow-up questions re motion for more definite statement.	1.80	900.00
Leveridge, R.	4/24/21	Review edits from Debtors' counsel re supporting material for opposition to personal jurisdiction insurers motion to dismiss (0.6); communications with Debtors' counsel re same (0.3).	.90	1,260.00
Leveridge, R.	4/24/21	Review jurisdictional discovery responses from certain personal jurisdiction insurers.	.40	560.00
Hudson, J.	4/25/21	Revise consolidated opposition to motions for more definite statement.	2.20	1,595.00
Rush, M.	4/25/21	Revise supporting documents for opposition to motions to dismiss.	.40	270.00
Rush, M.	4/25/21	Research issues re opposition to 12(e) motions.	1.50	1,012.50

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Name	Date	Services	Hours	Amount
Leveridge, R.	4/25/21	Review and provide comments to draft communications from Debtors' counsel to Court and insurer counsel re briefing schedule on motion to withdraw (0.6); review communications from UCC counsel re same (0.2).	.80	1,120.00
Shore, R.	4/26/21	Review and revise comments on opposition to motion to withdraw reference (3.4); review core/arbitration brief (1.6).	5.00	6,750.00
Hudson, J.	4/26/21	Revise opposition to motion to withdraw the reference.	1.00	725.00
Hudson, J.	4/26/21	Revise consolidated opposition to motions to withdraw the reference.	1.80	1,305.00
Hudson, J.	4/26/21	Revise opposition to motions re arbitration provisions.	.10	72.50
Hudson, J.	4/26/21	Communicate with co-plaintiffs' counsel re next steps for insurance recovery.	.10	72.50
Hudson, J.	4/26/21	Analyze status and strategy re insurance recovery.	.80	580.00
Hudson, J.	4/26/21	Revise template correspondence to insurers re bankruptcy status and potential settlement.	.30	217.50
Rubinstein, J.	4/26/21	Review bankruptcy court filings (0.5); review R. Shore comments to opposition to motion to withdraw the reference (0.4); review next steps re opposition to motions to dismiss based on lack of personal jurisdiction and supporting documents (1.9); review P. Breene letter to district court re briefing schedule re motion to withdraw the reference and correspondence with insurer counsel re same (0.3); review edits to A. Kramer declaration in support of opposition to motions to dismiss for lack of personal jurisdiction and provide comments re same (0.4); review personal jurisdiction insurer discovery responses as relates to opposition brief (1.2); review Navigators, AGLIC, and Steadfast objection to Debtor's disclosure statement (0.3); analysis re filing procedures/requirements (0.4); factual investigation re personal jurisdiction opposition (0.5).	5.90	4,720.00
Rush, M.	4/26/21	Revise opposition to personal jurisdiction motion to dismiss and supporting materials.	2.20	1,485.00
Rush, M.	4/26/21	Analyze supporting materials for opposition to motion to dismiss.	1.80	1,215.00
Johnson, K.	4/26/21	Confer with S. Colcock re filings in adversary proceeding.	.80	184.00
Johnson, K.	4/26/21	Revise motion tracking spreadsheet.	.50	115.00
Johnson, K.	4/26/21	Review recent jurisdictional discovery re Insurer #8.	.20	46.00

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Name	Date	Services	Hours	Amount
Gaske, A.	4/26/21	Analyze declaration and charts in support of personal jurisdiction opposition.	1.80	900.00
Gaske, A.	4/26/21	Review documents produced by Debtors (3.1); revise chart in support of personal jurisdiction opposition with documents (1.3).	4.40	2,200.00
Gaske, A.	4/26/21	Draft portion of transmittal declaration re personal jurisdiction opposition.	1.30	650.00
Gaske, A.	4/26/21	Review revisions to motions tracking chart.	.50	250.00
Leveridge, R.	4/26/21	Review edits from R. Shore re objection to motion to withdraw the reference (1.4); communications with Debtor's counsel re same (0.4).	1.80	2,520.00
Leveridge, R.	4/26/21	Review opposition briefs and prepare for filing same.	1.90	2,660.00
Leveridge, R.	4/26/21	Analyze jurisdictional discovery, materials from Debtors and proposed exhibits to opposition.	2.20	3,080.00
Farra, A.	4/26/21	Confer with R. Leveridge, J. Hudson, and M. Rush re litigation status update.	.30	187.50
Sraders, S.	4/26/21	Analyze insurer contacts and manner of presentation to the Court.	1.40	805.00
Sraders, S.	4/26/21	Revise draft chart showing various insurer contacts with the United States.	3.00	1,725.00
Colcock, S.	4/26/21	Confer with K. Johnson re opposition filing.	.80	264.00
Kaminsky, E.	4/26/21	Research follow-up questions re motion for more definite statement.	2.80	1,400.00
Quinn, K.	4/27/21	Confer with J. Hudson, R. Shore, and C. Litherland re revisions to brief.	.70	770.00
Shore, R.	4/27/21	Communicate with R. Leveridge re objection to motion to withdraw.	.40	540.00
Shore, R.	4/27/21	Review and revise core / arbitration brief (9.3); confer with C. Litherland, K. Quinn and J. Hudson re same (0.7).	10.00	13,500.00
Litherland, C.	4/27/21	Review portions of briefs related to policy reimbursement provisions and analyze related core jurisdiction arguments.	.60	840.00
Litherland, C.	4/27/21	Confer with R. Shore, K. Quinn, J. Hudson, and others re impact of reimbursement policy provisions, including plan impacts and core jurisdiction impacts.	.70	980.00
Hudson, J.	4/27/21	Confer with C. Litherland, K. Quinn and R. Shore re arbitration brief.	.70	507.50
Hudson, J.	4/27/21	Analyze arguments presented in arbitration motion.	.30	217.50
Hudson, J.	4/27/21	Analyze approaches to proofs of claim in oppositions.	.30	217.50

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Name	Date	Services	Hours	Amount
Hudson, J.	4/27/21	Revise consolidated opposition to motions for more definite statement per Debtors' comments.	.40	290.00
Glaebberman, M.	4/27/21	Confer with M. Rush, A. Gaske, S. Sraders, and team re strategy for review of documents in connection with personal jurisdiction motion to dismiss.	.80	240.00
Glaebberman, M.	4/27/21	Review documents in connection with personal jurisdiction motion to dismiss.	9.50	2,850.00
Rubinstein, J.	4/27/21	Review motion to withdraw reference response (0.2); factual investigation in support of personal jurisdiction opposition brief (1.1); review meet-and-confer correspondence from non-personal jurisdiction, non-arbitration insurers re outstanding requests and next steps (0.2); review Debtors' counsel (Reed Smith) comments re draft opposition to motions for more definite statement (0.4); review insurer personal jurisdiction discovery responses (0.5).	2.40	1,920.00
Jones, T.	4/27/21	Meet with M. Rush, A. Gaske, M. Glaebberman, C. Carey, J. Sanchez, and E. Kaminsky re opposition to motion to dismiss.	.80	240.00
Jones, T.	4/27/21	Review Debtors' documents in connection with motion to dismiss opposition.	4.70	1,410.00
Sanchez, J.	4/27/21	Review documents in preparation for the opposition to motion to dismiss.	3.80	1,425.00
Rush, M.	4/27/21	Review documents in support of personal jurisdiction motion to dismiss opposition.	2.20	1,485.00
Rush, M.	4/27/21	Confer with team re document review.	.80	540.00
Rush, M.	4/27/21	Revise opposition to personal jurisdiction motion to dismiss and supporting documents.	2.00	1,350.00
Martinez, S.	4/27/21	Cite check certain citations in consolidated memorandum of law in opposition to motions for more definite statement.	3.10	976.50
Johnson, K.	4/27/21	Review jurisdictional discovery re Insurers #4, #30, #34 and #37 (0.4); draft insurer response checklist (0.3).	.70	161.00
Johnson, K.	4/27/21	Cite check and fact check consolidated memorandum of law in opposition to motion for more definite statement.	3.20	736.00
Johnson, K.	4/27/21	Revise motion tracking spreadsheet.	.10	23.00
Johnson, K.	4/27/21	Review relevant policies on exhibit in support of complaint.	1.40	322.00
Johnson, K.	4/27/21	Review SDNY rules and protocols for filings (1.3); draft notice of appearance for A. Gaske (0.2).	1.50	345.00

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Name	Date	Services	Hours	Amount
Gaske, A.	4/27/21	Analyze which documents should be included in declaration in support of personal jurisdiction opposition (1.7); revise declaration (3.2).	4.90	2,450.00
Gaske, A.	4/27/21	Revise evidentiary chart in support of personal jurisdiction opposition re additional evidence.	1.50	750.00
Gaske, A.	4/27/21	Review potential exhibits in support of personal jurisdiction opposition.	.50	250.00
Gaske, A.	4/27/21	Confer with document review team re reviewing document production in support of personal jurisdiction opposition.	.80	400.00
Leveridge, R.	4/27/21	Analyze jurisdictional discovery.	1.20	1,680.00
Leveridge, R.	4/27/21	Review analyze comments sent to Debtors' counsel re objection to motion to withdraw (1.3); review additional comments from team re brief (0.6).	1.90	2,660.00
Leveridge, R.	4/27/21	Review discovery related letter from non-arbitration insurers (0.4); communications with Debtors' counsel re same (0.2).	.60	840.00
Leveridge, R.	4/27/21	Review comments from Debtors' counsel re opposition to motion for more definite statement.	.70	980.00
Leveridge, R.	4/27/21	Review Debtors' counsel comments re declaration in support of opposition to personal jurisdiction motion.	.60	840.00
Ogrey, S.	4/27/21	Cite check portion of draft of consolidated opposition to motions for more definite statement (common interest).	4.80	1,104.00
Carey, C.	4/27/21	Analyze Debtors' materials in connection with opposition to insurers' motion to dismiss.	1.60	680.00
Carey, C.	4/27/21	Confer with M. Rush, A. Gaske, S. Sraders, and team re document review in connection with opposition to insurers' motion to dismiss.	.80	340.00
Sraders, S.	4/27/21	Confer with review team re review of documents from Debtors for support in opposition to motion for personal jurisdiction.	.80	460.00
Sraders, S.	4/27/21	Draft charts of insurer contacts with United States.	2.50	1,437.50
Colcock, S.	4/27/21	Review local bankruptcy rules and Judge's rules for sealing motions.	.90	297.00
Kaminsky, E.	4/27/21	Confer with M. Rush and others re document review in support of personal jurisdiction discovery.	.80	400.00
Kaminsky, E.	4/27/21	Document review re opposition to motion to dismiss for lack of personal jurisdiction discovery.	2.00	1,000.00
Quinn, K.	4/28/21	Review draft opposition brief re arbitration.	4.00	4,400.00
Quinn, K.	4/28/21	Correspond with team re revisions to arbitration brief.	.30	330.00

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Name	Date	Services	Hours	Amount
Shore, R.	4/28/21	Analyze briefing and provide comments to same (5.4); review comments from Debtors' counsel (Reed Smith) (0.6).	6.00	8,100.00
Litherland, C.	4/28/21	Communications with R. Shore and others re potential need for findings re plan confirmation establishing loss for insurance.	.60	840.00
Hudson, J.	4/28/21	Prepare for strategy call with Debtors and UCC counsel.	.10	72.50
Hudson, J.	4/28/21	Confer with Debtors and UCC counsel re strategy.	.40	290.00
Hudson, J.	4/28/21	Revise draft opposition to arbitration motions.	1.10	797.50
Glaebberman, M.	4/28/21	Review documents in connection with personal jurisdiction motion to dismiss.	9.50	2,850.00
Rubinstein, J.	4/28/21	Analyze proposed edits to opposition to motion to stay in favor of arbitration (0.5); review additional personal jurisdiction discovery responses served by multiple insurer groups (0.9); provide comments on opposition to Liberty motion to stay pending resolution of reference motion and review updated version (0.7); analyze opposition to motion to dismiss for lack of personal jurisdiction (0.8); draft declaration in support of opposition to motion to dismiss for lack of personal jurisdiction (2.0); review comments to revised opposition to motion to stay for arbitration (0.5); review revised version of opposition to motion to withdraw the reference (0.5); review draft omnibus opposition to joinders to Liberty motion to withdraw reference (0.3).	6.20	4,960.00
Jones, T.	4/28/21	Review Debtors' documents in connection with motion to dismiss opposition.	8.30	2,490.00
Sanchez, J.	4/28/21	Review documents in preparation for the opposition to motion to dismiss.	2.80	1,050.00
Rush, M.	4/28/21	Revise brief in opposition to personal jurisdiction motion to dismiss and supporting materials.	2.70	1,822.50
Martinez, S.	4/28/21	Review Davis Polk database re denial / right of reservation correspondence from foreign insurers.	.50	157.50
Johnson, K.	4/28/21	Cite check and fact check consolidated memorandum of law in opposition to motions for definite statement.	.70	161.00
Johnson, K.	4/28/21	Confer with A. Gaske re insurer correspondence (0.2); review and organize same (1.0).	1.20	276.00
Johnson, K.	4/28/21	Review jurisdictional discovery re Insurers #11, #26 and #29.	.40	92.00
Johnson, K.	4/28/21	Communicate with W. Kane and S. Colcock re protocols for upcoming filings.	.60	138.00

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Name	Date	Services	Hours	Amount
Johnson, K.	4/28/21	Review language and draft citations re insurance neutrality and subject to amendment language in support of opposition to motion to dismiss based on lack of personal jurisdiction brief (0.4); research sources in support of same (0.6).	1.00	230.00
Gaske, A.	4/28/21	Analyze status of opposition to personal jurisdiction brief, declaration, and chart.	.70	350.00
Gaske, A.	4/28/21	Confer with Debtors, UCC, and others re status of settlements and next steps.	.40	200.00
Gaske, A.	4/28/21	Review database for insurer correspondence re personal jurisdiction opposition.	.30	150.00
Gaske, A.	4/28/21	Review policies re coverage territory (1.2); prepare exhibits for personal jurisdiction opposition (1.5).	2.70	1,350.00
Gaske, A.	4/28/21	Revise declaration and exhibit chart in support of personal jurisdiction opposition pursuant to M. Rush comments.	5.00	2,500.00
Gaske, A.	4/28/21	Confer with S. Martinez re review of insurer correspondence in database for personal jurisdiction opposition.	.30	150.00
Gaske, A.	4/28/21	Confer with K. Johnson re insurer correspondence for personal jurisdiction opposition.	.20	100.00
Leveridge, R.	4/28/21	Revise opposition to motion to stay in favor of arbitration (4.1); review comments from R. Shore, K. Quinn, J. Hudson and C. Litherland re same (0.6); communications with Debtors' counsel and UCC counsel re same (0.2).	4.90	6,860.00
Leveridge, R.	4/28/21	Review Debtors' counsel edits to personal jurisdiction opposition.	1.30	1,820.00
Leveridge, R.	4/28/21	Review jurisdictional discovery responses from personal jurisdiction moving insurers.	1.20	1,680.00
Carey, C.	4/28/21	Continue reviewing document production in connection with opposition to insurers' motion to dismiss.	5.40	2,295.00
Colcock, S.	4/28/21	Communicate with W. Kane and K. Johnson re motion to seal.	.80	264.00
Kaminsky, E.	4/28/21	Document review re opposition to motion to dismiss for lack of personal jurisdiction discovery.	5.20	2,600.00
Shore, R.	4/29/21	Communications with litigation team re briefs and drafting issues.	1.00	1,350.00
Shore, R.	4/29/21	Revise and comment on personal jurisdiction opposition, opposition to joinder to motion to withdraw the reference, opposition to stay motion, and opposition to objections to disclosure statement.	10.00	13,500.00

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Name	Date	Services	Hours	Amount
Litherland, C.	4/29/21	Review portions of responses to joinders re objections to settlements and consider impact on core jurisdiction.	.30	420.00
Litherland, C.	4/29/21	Communications with R. Leveridge, R. Shore, and others re comments to objections to joinders.	.40	560.00
Hudson, J.	4/29/21	Review personal jurisdiction opposition.	.20	145.00
Hudson, J.	4/29/21	Revise draft of consolidated opposition to motions for more definite statement.	.90	652.50
Hudson, J.	4/29/21	Communicate with Debtors (Davis Polk and Reed Smith) re wording for alleged liability for use in oppositions to responses to the complaint.	.50	362.50
Glaeberman, M.	4/29/21	Review documents in connection with personal jurisdiction motion to dismiss.	9.40	2,820.00
Rubinstein, J.	4/29/21	Revise opposition to motions to dismiss for lack of personal jurisdiction per comments from multiple constituencies (4.2); revise J. Rubinstein declaration in support of opposition to motions to dismiss for lack of personal jurisdiction and compile exhibits thereto (0.8); review proposed edits to opposition to motion for more definite statement circulated by D. Windscheffel and additional edits from others (0.4).	5.40	4,320.00
Jones, T.	4/29/21	Review Debtors' documents in connection with motion to dismiss opposition.	8.00	2,400.00
Rush, M.	4/29/21	Revise opposition to personal jurisdiction motion to dismiss.	6.90	4,657.50
Rush, M.	4/29/21	Communicate with J. Rubinstein and R. Leveridge re opposition to personal jurisdiction motion to dismiss.	.50	337.50
Rush, M.	4/29/21	Revise motion to seal personal jurisdiction opposition.	.90	607.50
Johnson, K.	4/29/21	Review jurisdictional discovery re Insurers #1 and #29; revise tracking spreadsheet.	.30	69.00
Johnson, K.	4/29/21	Finalize and file notices of appearance for A. Gaske and M. Rush.	.40	92.00
Johnson, K.	4/29/21	Review language and draft citations in support of opposition to motion to dismiss based re lack of personal jurisdiction brief.	.40	92.00
Gaske, A.	4/29/21	Analyze status of personal jurisdiction opposition.	.70	350.00
Gaske, A.	4/29/21	Communicate with K. Johnson re notice of appearance.	.20	100.00
Gaske, A.	4/29/21	Analyze exhibits for personal jurisdiction opposition.	3.50	1,750.00
Gaske, A.	4/29/21	Review personal jurisdiction discovery responses re chart in personal jurisdiction opposition.	.40	200.00

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Name	Date	Services	Hours	Amount
Gaske, A.	4/29/21	Revise declaration in support of personal jurisdiction opposition re additional changes and edits.	2.10	1,050.00
Gaske, A.	4/29/21	Review additional policies re coverage territory re personal jurisdiction opposition.	1.00	500.00
Leveridge, R.	4/29/21	Review and revise draft of personal jurisdiction opposition brief provided by Debtors' counsel (4.3); communications with Debtors' counsel re same (0.5).	4.80	6,720.00
Leveridge, R.	4/29/21	Review status of filings due 5/3 and related projects (1.2); confer with co-counsel re same (1.0).	2.20	3,080.00
Leveridge, R.	4/29/21	Communications with Debtors' counsel re motion to seal and material subject to same.	.60	840.00
Leveridge, R.	4/29/21	Review status of insurer jurisdictional discovery responses (0.2); communications with HDI's counsel re status of outstanding jurisdictional discovery responses from HDI (0.2).	.40	560.00
Leveridge, R.	4/29/21	Communications with Debtors' counsel re opposition to TIG's motion to lift the stay.	.40	560.00
Sraders, S.	4/29/21	Draft chart showing insurer litigation in the United States.	3.10	1,782.50
Sraders, S.	4/29/21	Draft motion to seal.	2.90	1,667.50
Gilbert, S.	4/30/21	Analyze status of insurance litigation and recovery strategy.	.50	850.00
Shore, R.	4/30/21	Analyze strategy re opposition briefs and arbitration.	1.20	1,620.00
Shore, R.	4/30/21	Revise and provide comments on personal jurisdiction and arbitration / core brief.	9.00	12,150.00
Litherland, C.	4/30/21	Revise draft opposition to stay for arbitration.	2.40	3,360.00
Hudson, J.	4/30/21	Communicate with AHC, NSCG and MSGE re final draft of opposition re personal jurisdiction.	.50	362.50
Hudson, J.	4/30/21	Finalize draft of consolidated opposition to motions for more definite statement.	2.70	1,957.50
Hudson, J.	4/30/21	Communicate with non-consenting statement group re oppositions to be filed Monday.	.10	72.50
Hudson, J.	4/30/21	Communicate with MSGE group re oppositions to be filed Monday.	.10	72.50
Hudson, J.	4/30/21	Review next steps for finalizing opposition briefs.	.40	290.00
Hudson, J.	4/30/21	Revise arbitration opposition.	.90	652.50
Hudson, J.	4/30/21	Revise arbitration and core-related opposition.	.10	72.50
Glaebberman, M.	4/30/21	Review documents in connection with personal jurisdiction motion to dismiss.	11.70	3,510.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	4/30/21	Revise various oppositions to motions due May 3 and accompanying documents.	8.60	6,880.00
Wolf, D.	4/30/21	Review status of pending insurance adversary motions.	.40	280.00
Jones, T.	4/30/21	Review Debtors' documents in connection with motion to dismiss opposition.	9.00	2,700.00
Rush, M.	4/30/21	Draft supporting materials for opposition to personal jurisdiction motions to dismiss.	4.10	2,767.50
Rush, M.	4/30/21	Revise opposition to personal jurisdiction motions to dismiss.	4.90	3,307.50
Johnson, K.	4/30/21	Revise exhibits in support of J. Rubinstein declaration (0.6); cite check and revise opposition to motion for more definite statement (1.6); draft long and short form citations re A. Gaske and A. Kramer declarations (0.4); draft email to Judge Drain re 5/3 filing (0.6); research complaint re WorldCom Sec. Litig. (0.9); confer with D. Li re motion to seal filing (0.3).	4.40	1,012.00
Johnson, K.	4/30/21	Review jurisdictional discovery re Insurers #16 and #17; revise tracking spreadsheet.	.30	69.00
Gaske, A.	4/30/21	Revise chart in support of personal jurisdiction opposition re insurer contacts column.	4.90	2,450.00
Gaske, A.	4/30/21	Revise chart in support of personal jurisdiction opposition re premiums and revenue column.	2.50	1,250.00
Leveridge, R.	4/30/21	Revise briefs re personal jurisdiction, motion for definite statement, opposition to motion to stay in favor of arbitration, objection to motion to withdraw the reference and TIG motion to lift stay.	7.60	10,640.00
Ogrey, S.	4/30/21	Continue cite checking current version of draft consolidated opposition to motions for more definite statement (common interest).	5.30	1,219.00
Carey, C.	4/30/21	Continue review of Debtors' production re opposition to insurers' motion to dismiss.	4.40	1,870.00
Sraders, S.	4/30/21	Revise chart showing insurer litigation in the United States.	3.50	2,012.50
Sraders, S.	4/30/21	Revise draft motion to seal to incorporate comments from R. Leveridge, J. Rubinstein, and M. Rush.	1.80	1,035.00
Sraders, S.	4/30/21	Review exhibits to J. Rubinstein declaration.	.70	402.50
Colcock, S.	4/30/21	Begin cite checking opposition to motions for more definite statement.	6.90	2,277.00

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Name	Date	Services	Hours	Amount
Kaminsky, E.	4/30/21	Revise opposition to motion for more definite statement.	2.10	1,050.00
Project Total:			856.00	\$ 681,896.50
TOTAL CHARGEABLE HOURS			1,148.20	
TOTAL FEES				\$ 950,858.50

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	61.00	1,700.00	103,700.00
Quinn, K.	29.90	1,100.00	32,890.00
Shore, R.	88.70	1,350.00	119,745.00
Litherland, C.	8.90	1,400.00	12,460.00
Holland, P.	4.20	290.00	1,218.00
Hudson, J.	105.70	725.00	76,632.50
Glaebberman, M.	40.90	300.00	12,270.00
Grim, E.	50.70	700.00	35,490.00
Rubinstein, J.	111.40	800.00	89,120.00
Wolf, D.	30.60	700.00	21,420.00
Jones, T.	30.80	300.00	9,240.00
Sanchez, J.	7.40	375.00	2,775.00
Rush, M.	107.40	675.00	72,495.00
Martinez, S.	3.90	315.00	1,228.50
Johnson, K.	34.30	230.00	7,889.00
Gaske, A.	104.00	500.00	52,000.00
Leveridge, R.	149.90	1,400.00	209,860.00
Ogrey, S.	13.70	230.00	3,151.00
Farra, A.	3.60	625.00	2,250.00
Carey, C.	12.20	425.00	5,185.00
Sraders, S.	92.50	575.00	53,187.50
Colcock, S.	9.40	330.00	3,102.00
Kaminsky, E.	47.10	500.00	23,550.00
TOTALS	1,148.20		\$ 950,858.50

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TASK SUMMARY

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	18.60	16,460.50
A004	Case Administration	7.20	8,719.50
A006	Employment / Fee Applications	4.70	1,568.00
A009	Meetings / Communications with AHC & Creditors	64.90	85,462.50
A019	Plan of Reorganization / Disclosure Statement	196.80	156,751.50
A020	Insurance Adversary Proceeding	856.00	681,896.50

EXPENSE DETAILS

E105: Telephone

Date	Description	Task	Amount
4/06/21	Conference Call / CourtSolutions LLC / K. Quinn / Attend Hearing / 04.06.2021	E105	70.00
4/06/21	Conference Call / CourtSolutions LLC / R. Shore / Attend Hearing / 04.06.2021	E105	70.00
4/23/21	Conference Call / CourtSolutions / R. Shore / Attend Hearing / 03/24/2021	E105	70.00
4/23/21	Conference Call / CourtSolutions / J. Rubinstein / Attend Hearing / 04/06/2021	E105	70.00
4/23/21	Conference Call / CourtSolutions / R. Shore / Attend Hearing / 04/06/2021	E105	70.00
Sub-Total of Expenses:			\$ 350.00

E106: Online Research

Date	Description	Task	Amount
4/28/21	Lexis	E106	250.91
4/30/21	Westlaw	E106	4,405.21
4/30/21	PACER	E106	245.50
Sub-Total of Expenses:			\$ 4,901.62

E112: Court Fees

Date	Description	Task	Amount
4/16/21	Filing Fees / Application for Pro Hac Vice Admission / J. Rubinstein / 04.16.2021	E112	200.00
Sub-Total of Expenses:			\$ 200.00

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E116: Trial Transcripts

Date	Description	Task	Amount
4/06/21	Depositions / Transcripts / Veritext / Transcript Fee	E116	118.80
	Sub-Total of Expenses:		\$ 118.80
	TOTAL EXPENSES		\$ 5,570.42
	TOTAL FEES AND EXPENSES		\$ 956,428.92